

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

ESTATE OF GEORGE BERNARD WORRELL, JR.,

Plaintiff,

-vs-

Case No. 4:22-cv-11009-FKB-DRG
District Judge F. Kay Behm
Magistrate Judge: David R. Grand

THANG, INC. and GEORGE CLINTON,

Defendants.

_____ /
The deposition of ARMEN BOLADIAN, a witness in
the above-entitled cause, taken before Suzanne Lynn
Bonarek, Certified Shorthand Reporter and Notary Public,
via Zoom videoconferencing, on the 4th day of December,
2024 commencing at or about 1:07 p.m., pursuant to the
Federal Rules of Civil Procedure.

APPEARANCES:

DICKINSON WRIGHT, PLLC
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Troy, Michigan 48084
BY: MR. DANIEL QUICK
Appearing on behalf of Plaintiff

SCHENK & BRUETSCH, PLC
211 West Fort Street
Suite 1410
Detroit, Michigan 48226
BY: MR. JAMES ALLEN, SR.
Appearing on behalf of Defendants

1 (APPEARANCES CONTINUED):

2 KING & BALLOW
3 2121 Ave. Of the Stars
4 Suite 800
5 Century City, California 90067
6 BY: MR. RICHARD BUSCH
7 Appearing on behalf of Armen Boladian

8 HERTZ SCHRAM, P.C.
9 1760 South Telegraph Road
10 Suite 300
11 Bloomfield Hills, Michigan 48302
12 BY: MR. HOWARD HERTZ
13 Appearing on behalf of Armen Boladian

14 ALSO PRESENT: Erik Scharf
15 George Clinton
16 Archie Ivy

17 (NOTE: All attendees appearing remotely. Witness
18 sworn in remotely pursuant to agreement.)
19
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21
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23
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25

I N D E XWITNESSPAGE

ARMEN BOLADIAN

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1 Remote deposition

2 Wednesday, December 4, 2024

3 At or about 1:07 p.m.

4 * * *

5 A R M E N B O L A D I A N

6 Having first been duly sworn to tell the truth, was
7 examined and testified upon his oath as follows:

8 MR. ALLEN: Mr. Boladian, will you please
9 state and spell your name, for the record.

10 THE WITNESS: Armen Boladian, A-R-M-E-N,
11 last name B-O-L-A-D-I-A-N.

12 MR. ALLEN: Thank you. This is the
13 deposition of Armen Boladian being taken pursuant to
14 Notice and court order, for all uses under the Federal
15 Court Rules.

16 I have a short announcement. In the room
17 with me on a muted laptop and not on screen is my
18 colleague, Erik Scharf, who'll be assisting with the
19 exhibits today.

20 Mr. Scharf is an admitted member of the 6th
21 Circuit and the Eastern District, member of the
22 Florida Bar, and is appellate counsel to my firm in a
23 number of matters, and is familiar with the facts in
24 this case.

25 And on short notice he's agreed to assist

1 me in making sure that the deposition runs smoothly,
2 given the new technology that we're all trying to get
3 used to.

4 MR. BUSCH: Mr. Allen, may I just -- this
5 is Richard Busch. May I just interrupt you for a
6 second.

7 MR. ALLEN: Well, I can't see you, sir.

8 MR. BUSCH: Oh, I don't know why.

9 MR. ALLEN: It says Sarah Catlett speaking.

10 MR. BUSCH: As I said, the computer, Zoom
11 computer, might say Sarah Catlett but it's me. And my
12 video is turned on so I'm not sure why you can't see
13 me. Hold on, let me see, let me see if I can fix
14 that.

15 COURT REPORTER: If I can go off the
16 record.

17 (WHEREUPON an off the record
18 discussion was had with the
19 court reporter.)

20 MR. BUSCH: All right. So Mr. Boladian is
21 completely blind, can't see a thing and so I don't
22 know how you intend to show him exhibits, but he
23 cannot -- he will not be able to look at anything.

24 MR. ALLEN: Well, I'll read them to him,
25 how's that.

1 MR. BUSCH: It's your three hours.

2 MR. ALLEN: All right. I'm also, in light
3 of the manner in which the documents for this
4 deposition were produced, I'm reserving my right to
5 seek additional time from Magistrate Judge David
6 Grand, and we'll make that determination at the
7 conclusion of the deposition as to whether I do that.

8 Mr. Boladian, you've had your deposition
9 taken before on many occasions, but I'll just refresh
10 your recollection on some of the rules here.

11 The court reporter's going to take down
12 everything I say and is going to take down everything
13 you say, and will take down everything that any
14 objecting attorney is going to say during the course
15 of the deposition.

16 It's important that we not talk over one
17 another. So if I'm asking a question, I'd ask you to
18 wait till I'm complete with my question and then
19 answer it. I will do the same courtesy for you.

20 If your attorney or one of other attorneys
21 objects, please allow them to place their objection on
22 the record and we'll move on from there. Can you do
23 that for me?

24 THE WITNESS: Yes.

25 MR. ALLEN: Your attorney, Mr. Busch, has

1 indicated that you are completely blind and cannot
2 see. Is there any other condition that you are
3 suffering from today that would impede your ability to
4 testify truthfully to my questions?

5 THE WITNESS: Well, I have a number of
6 additional health issues. I don't know if you want me
7 to go through them or not.

8 MR. ALLEN: I only want to know whether any
9 of those health issues are going to impede your
10 ability to hear my questions and answer truthfully.

11 THE WITNESS: I don't know but, I don't --

12 MR. ALLEN: Are you --

13 THE WITNESS: -- I'm just letting you know.

14 MR. ALLEN: Are you on any form of
15 medication that has altered your ability to think?

16 THE WITNESS: Well, I do take medication.

17 MR. ALLEN: That wasn't my question, sir.
18 Are you on any form of medication that will impede
19 your cognitive ability?

20 THE WITNESS: I don't know, sir.

21 MR. ALLEN: Do you suffer from dementia?

22 THE WITNESS: A little bit.

23 MR. ALLEN: I'm sorry?

24 THE WITNESS: Yes, a little bit.

25 MR. ALLEN: Okay. Does that impede your

1 ability to testify truthfully?

2 THE WITNESS: I don't know, I'll do the
3 best I can.

4 MR. ALLEN: All right. You'll do the best
5 you can for us, correct?

6 THE WITNESS: Yes, sir.

7 MR. ALLEN: All right. This is going to be
8 a short deposition today. You know, I will try to be
9 brief and move along quickly. If for some reason you
10 do need to take a break, I would just ask that you not
11 do that in between a question that I pose and an
12 answer that I expect, okay?

13 THE WITNESS: Fine.

14 MR. ALLEN: Thank you.

15 I wanted to start with a series of
16 correspondence that occurred in 1997 between Judith
17 Worrell and yourself -- I'm sorry, and Special Master
18 Friedman. And I'm going to ask you some questions
19 about that.

20 So, Erik, if you can pull that up, please.

21 EXAMINATION

22 BY MR. ALLEN:

23 Q Are you aware, sir, that in February -- on February
24 19, 1997 the personal representative of the estate of
25 Bernie Worrell, Judith Worrell, contacted Special

1 Master in a case, Tercer Mundo versus Armen Boladian,
2 Bridgeport Music, Inc., et al, and made many of the
3 same allegations against you that she's now making in
4 this, in this lawsuit?

5 MR. QUICK: Object to form.

6 A I don't even remember the agreement, sir.

7 Q (Continuing by MR. ALLEN): It's not an agreement,
8 sir. Are you aware that Ms. Worrell in 1997 made
9 allegations that you were not providing money or that
10 your companies were not providing money for royalties
11 that she's now seeking from my client, George Clinton?

12 MR. BUSCH: I object to the form of that
13 question.

14 MR. ALLEN: You may answer, Mr. Boladian.

15 MR. BUSCH: And it mischaracterizes the
16 document.

17 A As far as I know, we paid everything that might have
18 been due at the time.

19 Q (Continuing by MR. ALLEN): But you are aware that
20 Ms. Worrell made allegations against you, that you
21 were not paying her royalties that her husband -- or
22 were not paying her husband royalties that he had
23 earned?

24 MR. BUSCH: Objection, asked and answered.
25 And would you please clarify whether you're talking

1 about publishing royalties or sound recording
2 royalties.

3 MR. ALLEN: I think -- you can object to
4 form, sir, but you're testifying for the, for the
5 witness.

6 MR. BUSCH: I am not testifying. I asked
7 for a clarification of the question. You used the
8 word royalties. There are different types of
9 royalties. You know what this letter refers to. And
10 I'm asking you to clarify, so that we have a clear
11 record, whether you're referring to publishing
12 royalties or sound recording royalties. I'm not
13 testifying, I'm asking you to clarify.

14 MR. ALLEN: Sir, my question is what my
15 question is. Sue, if you can --

16 MR. BUSCH: You refuse to clarify the
17 question?

18 MR. ALLEN: I refuse to clarify the
19 question because it was clear on its face.

20 MR. BUSCH: Royalties could be many types
21 of royalties. It's not clear.

22 MR. ALLEN: If you think you're going to
23 filibuster, if you think you're going to filibuster me
24 for three hours --

25 MR. BUSCH: I'm not going to filibuster

1 you. If you would just clarify the question, --

2 MR. ALLEN: You're in enough trouble as it
3 is. Don't make it --

4 MR. BUSCH: -- it would make it easier.
5 I'm in enough trouble as it is?

6 MR. ALLEN: Yeah, you are.

7 MR. BUSCH: Why am I in trouble?

8 MR. ALLEN: We'll talk about that after the
9 deposition. I got three hours and I'm asking
10 questions.

11 Ms. Bonarek, will you please read the
12 question back that I posed, please.

13 A As far as I know, we paid whatever is due or owing.
14 Other than that I don't know anymore really.

15 Q (Continuing by MR. ALLEN): So was Ms. Worrell lying
16 in 1997 when she claimed that you did not pay her
17 money that -- or did not pay her husband money that
18 she thought her husband was due?

19 MR. QUICK: Objection to form.

20 MR. BUSCH: Yeah, I object to the form of
21 the question as well. It mischaracterizes the
22 document and lack of foundation.

23 A Again whatever we owed, we paid and that's all I can
24 remember. That's all I know really.

25 Q (Continuing by MR. ALLEN): So Ms. Worrell has a

1 history of telling people that they owe her husband
2 money and they don't, is that what your testimony is?

3 MR. QUICK: Objection, form.

4 MR. BUSCH: Yeah, objection, that's not --
5 objection, mischaracterize his testimony, asked and
6 argumentative.

7 MR. QUICK: And form.

8 A Again if we owed any money, I'm sure we paid. I don't
9 know what she's referring to. In fact we've even paid
10 advanced monies to Bernie Worrell.

11 Q (Continuing by MR. ALLEN): Okay.

12 A So I don't --

13 Q So you -- go ahead, finish.

14 A -- know what she might be referring to really.

15 Q So your testimony is, is that she was incorrect when
16 she made allegations that you were withholding money
17 that was due to her husband?

18 MR. BUSCH: Same objections.

19 MR. QUICK: Objection to form.

20 MR. BUSCH: Yeah, same objections.

21 A Like I said, if we owed her any money, we paid it. If
22 there wasn't anything due, then obviously we didn't
23 pay it.

24 Q (Continuing by MR. ALLEN): Okay. So Ms. Worrell was
25 incorrect when she said that you owed her husband

1 money?

2 MR. BUSCH: Same objections.

3 MR. QUICK: Same objection.

4 A She may have been thinking of something else, I don't
5 know, or had the situation confused with something, I
6 don't know.

7 Q (Continuing by MR. ALLEN): Okay. Sir, you are the
8 owner of a company called Westbound Records, are you
9 not?

10 A Yes, sir.

11 Q When did you, when did you start Westbound Records?

12 A It's been over 50, 50 years.

13 Q Is there any --

14 MR. QUICK: I'm sorry to interrupt, can I
15 just clarify. The document you were just showing on
16 the screen, are you marking at that as Exhibit 1 in
17 this deposition?

18 MR. ALLEN: Yes, I am.

19 MR. QUICK: Okay, thank you.

20 Q (Continuing by MR. ALLEN): What year, sir, did you
21 start Westbound Records, to the best of your
22 recollection?

23 A About 50, over 50 years ago.

24 Q Has anybody else had an ownership interest in
25 Westbound Records other than you?

- 1 A Not that I know of.
- 2 Q Okay. So today, and for the life of the company, you
- 3 have been the sole owner of Westbound Records?
- 4 A In the United States, yes. And --
- 5 Q Has --
- 6 A -- could have happened elsewhere around the world I'm
- 7 not aware of.
- 8 Q And as the owner of Westbound Records, did you have an
- 9 opportunity to employ individuals for the purpose of
- 10 making sound recordings?
- 11 A When you say employed, are you referring to musicians
- 12 or secretaries or what?
- 13 Q Everybody, have you employed individuals in connection
- 14 with your business, Westbound Records, in connection
- 15 with making sound recordings?
- 16 A Well, if they were doing any work for me, we paid
- 17 them. You know, it could have been on a per session,
- 18 one session or two at time. It could have been
- 19 various different people. That's a broad question,
- 20 you know.
- 21 Q Okay. Well, let me ask you some specific questions.
- 22 Did you ever employ a person by the name of Tiki
- 23 Fulwood?
- 24 A Who, Tiki?
- 25 Q Fulwood, yes, a drummer.

1 A Yeah, I'm sure.

2 Q Was he an employee of Westbound Records?

3 MR. QUICK: Object to form.

4 A Employee of Westbound, he was a musician that we paid
5 for doing the session. He was --

6 Q (Continuing by MR. ALLEN): Okay.

7 A -- a artist as part of, part of a group.

8 Q And he was also a member of a union, was he not?

9 A Which union are you referring to?

10 Q American Federation of Musicians.

11 A Yes, as far as I know he was.

12 Q Okay. And Westbound Records was a signatory to a
13 Collective Bargaining Agreement with the American
14 Federation of Musicians in the 1970's, was it not?

15 A Yes, sir.

16 Q Yes, it was?

17 A Yes.

18 Q Okay. And how about the 1980's, was Westbound Records
19 a signatory to a Collective Bargaining Agreement with
20 the American Federation of Musicians in the 1980's?

21 A We were back then and we continued, to the best of my
22 knowledge.

23 Q Okay. So do you recall a Westbound employee by the
24 name of Eddie Hazel?

25 A Eddie was also part of the group Funkadelic.

1 Q And he was also a paid employee under a Collective
2 Bargaining Agreement that you had -- that Westbound
3 Records entered with the American Federation of
4 Musicians, correct?

5 MR. QUICK: Objection.

6 MR. BUSCH: Objection to the form.
7 Objection to the form, paid employee.

8 MR. QUICK: Join.

9 A He was a musician that we paid. He was not a direct
10 employee of Westbound, but a contract musician which
11 was paid according to the federation.

12 Q (Continuing by MR. ALLEN): Okay. Sir, I'm going to
13 reference a document. I'm assuming you can't see the
14 document so I'm going to reference the document. It's
15 a contract, Phonographic Recording Contract, with the
16 American Federation of Musicians. It's contract
17 number 103107 dated 9 July 1976.

18 MR. SCHARF: Close out of the --

19 MR. ALLEN: Escape, yeah, close out of that
20 document. I don't know that it's going to do any good
21 to show the, show the exhibit.

22 MR. QUICK: Well, I'd like to see it if
23 you're going to ask questions about it.

24 MR. ALLEN: Okay, go ahead.

25 MR. SCHARF: Let me escape out of this.

1 MR. ALLEN: Yeah.

2 MR. SCHARF: Where would this be?

3 MR. ALLEN: It's the top document.

4 MR. SCHARF: Oh, oh, it's the top. I see,
5 it's the AFM -- got it.

6 MR. ALLEN: Yes.

7 MR. SCHARF: Okay, is it the first one?

8 MR. ALLEN: Yes. I'm going to mark this,
9 Sue, as Exhibit 2.

10 Q (Continuing by MR. ALLEN): This is a contract 103107
11 dated 9 July 1976. It purports to bear your
12 signature, but I take it you can't identify your
13 signature on this document, Mr. Boladian. Can you see
14 it on the screen; Mr. Boladian, can you see the
15 document on the screen?

16 A I can't see anything, sir.

17 Q Okay. So I'm going to read from this document and ask
18 you questions about whether this document correctly
19 states the arrangement that you had with the musicians
20 that are listed.

21 It says the -- on the second paragraph, the
22 employer, which is referred to as Westbound Records,
23 "the employer hires the employees as musicians
24 severally on the terms and conditions below and is
25 further specified on the reverse side."

1 "The leader represents that the employees
2 already designated have agreed to be bound by said
3 terms and conditions. Each employee yet to be chosen
4 shall be so bound by said terms and conditions upon
5 agreeing to accept his employment."

6 "Each employee may enforce this agreement.
7 The employees severally agree to render collectively
8 to the employer services as musicians in the orchestra
9 under the leadership of Bernard Mendelson."

10 And then there are a number of employees
11 that are listed. There's Bernard Mendelson, Clarence
12 Haskins, Bernie Worrell and Steven Bookvich. Those
13 were employees of Westbound Records according to this
14 document, would you agree?

15 A As --

16 MR. QUICK: Object to form.

17 A As musicians, correct, sir.

18 Q (Continuing by MR. ALLEN): Right. Musicians can be
19 -- you would agree with me that musicians can be
20 employees, right?

21 MR. BUSCH: Just object -- I object to the
22 form. The document speaks for itself.

23 A For that particular session they were employed.
24 Whatever session you're referring to, whatever it was,
25 they were listed and they were paid as musicians

1 according to the Federation of Musicians.

2 Q (Continuing by MR. ALLEN): And if they're listed on
3 these AFM contracts, they were your employees at
4 Westbound Records, correct?

5 MR. BUSCH: Objection, that calls for a
6 legal conclusion. Object to form.

7 MR. QUICK: Join.

8 A For that particular session.

9 Q (Continuing by MR. ALLEN): Thank you. And skipping
10 ahead, there are a number of other contracts that are
11 like this with individuals listed as employees.

12 You would agree that you would -- you had a
13 number of musicians that you employed for various
14 sessions, sessions under the AFM Collective Bargaining
15 Agreement, correct?

16 MR. BUSCH: Same objection. Objection to
17 form and it calls for a legal conclusion and the
18 document speaks for itself.

19 MR. QUICK: Join.

20 A Various musicians were employed and we paid them for
21 the session work they did and that was it.

22 Q (Continuing by MR. ALLEN): And they were employees,
23 correct?

24 MR. BUSCH: Objection, calls for a legal
25 conclusion. Object to the form of the question.

1 A For that particular session.

2 Q (Continuing by MR. ALLEN): Thank you. Now this first
3 contract refers to Pac 3 Recording at 7106 Greenfield
4 Road. Do you remember that studio?

5 A Yes, sir, I remember.

6 Q And it was owned by a Richard Becker at this time, was
7 it not?

8 A Yes.

9 Q Richard Becker was a friend of yours, was he not?

10 A Richard Becker was -- owned the studio. And when you
11 say friend, he was a person that we did business with.
12 If you want to consider that a friend, okay. I mean
13 he was not an enemy. He was a decent guy, you know.

14 Q Do you remember going to his funeral?

15 A I didn't go to the cemetery but I did go to his
16 funeral, yeah.

17 Q And you were with Mr. Martin that day too, weren't
18 you?

19 A That's right.

20 Q And you had a conversation with his son, Bob Becker,
21 that day, do you recall that?

22 A Oh, we had many conversations. I can't specifically
23 say Bob Becker. But if that's his son, I'm sure we
24 offered our condolences, you know.

25 Q And Mr. Becker gave you a box full of documents that

1 were related to Westbound Records that day, did he
2 not?

3 A No, I don't remember. I don't recall that.

4 Q You don't recall that, okay. Now you recall that you
5 were asked to produce a number of documents according
6 to a subpoena that was served. Who assisted in
7 preparing the documents that were produced for this
8 deposition?

9 A Could you clarify that whole statement again.

10 Q Okay. There are a number of documents that were
11 produced in connection with a subpoena and court order
12 in this case. I'm asking who compiled those
13 documents?

14 A I don't know, it could have been Mr. Levinson, Mark
15 Levinson. It could have been Sarah that maybe
16 assisted. I'm not sure, sir.

17 Q Who is Mr. Levinson?

18 A He's an attorney that I employed to handle the
19 paperwork on this case.

20 Q Is he with a firm or is he an in-house attorney?

21 A He's not in-house. He's an outside attorney that we,
22 that we pay.

23 Q Okay. And what firm is he with?

24 A He's an individual, has his own business. I mean I
25 don't think he's -- Mark is with a firm. I think it's

1 just Mark Levinson, attorney.

2 Q And when you referenced Sarah, would that be Sarah
3 Catlett?

4 A Yes.

5 Q Okay. And beyond Mr. Levinson and Ms. Catlett is
6 there anybody else you think may have assisted with
7 compiling these documents?

8 A Not that I know of.

9 Q There were a number of documents produced from a
10 company called Bridgeport Music. Are you familiar
11 with Bridgeport Music?

12 A I am, sir.

13 Q What is Bridgeport Music?

14 A It's a music publishing company.

15 Q And is it your testimony that Bridgeport Music does
16 not own sound recordings?

17 A No.

18 Q Okay. There are royalty statements, royalty summaries
19 that have been provided for George Bernard Worrell,
20 and they're broken out in a way that I'd like to ask
21 you some questions about.

22 There are royalties that are paid for, it's
23 listed as digital on the royalty summaries. What are
24 digital royalties for?

25 A I think you should ask Sarah. This is some new

1 technology that I'm not totally familiar with, and
2 can't answer you in a truthful way so...

3 Q Okay. Do you know anything about what karaoke
4 royalties are?

5 A I'm not sure. I, I'm not sure.

6 Q The karaoke royalties, are those royalties for
7 recordings of the songs?

8 A It could be maybe a, I don't know, performance or
9 something.

10 Q Okay. Well, I was going to ask about performance
11 because performance is listed at zero dollars and zero
12 cents on all of these.

13 What about ringtones, are ringtones sound
14 recordings?

15 MR. BUSCH: Objection, lack of foundation.

16 A I'm not familiar with it, sir.

17 Q (Continuing by MR. ALLEN): Do you know what a
18 ringtone royalty is?

19 A No.

20 Q All right. What is a synch royalty, S-Y-N-C-H?

21 A Those are royalties from the sound recordings
22 synchronization. It's an abbreviation.

23 Q Okay. So those are for sound recordings?

24 MR. BUSCH: Objection to form.

25 A Royalties from sound recordings.

1 Q (Continuing by MR. ALLEN): Got it. What are grand
2 rights, sir?

3 A Grand rights?

4 Q Uh-huh.

5 A Would be -- I'm not quite sure but I believe it's live
6 performances on stage type of thing.

7 Q Right. So that would involve sound recordings as
8 well, correct?

9 A Well, --

10 MR. BUSCH: Object to form.

11 A It could if they use sound recordings in a stage
12 performance. So, you know, could be a combination of
13 both.

14 Q (Continuing by MR. ALLEN): Okay. Walk me through how
15 a grand rights royalty is calculated; how does your
16 company calculate that?

17 MR. BUSCH: Object to form, lack of
18 foundation.

19 A I honestly can't tell you, sir. I think you have to
20 speak to someone that does royalties and, and is more
21 familiar with the, the nuts and bolts of something of
22 that type.

23 Q (Continuing by MR. ALLEN): Right. And who would that
24 be in your company?

25 A Well, to the best of my knowledge, Mark Levinson could

1 perhaps give you more insight. And Sarah might be
2 able to give you more insight.

3 Q Okay. There are notations after some of the payments
4 that are registered on these royalty statements that
5 say DB after them. What does the DB stand for?

6 MR. BUSCH: Objection, lack of foundation.

7 A It could be debit.

8 MR. BUSCH: Armen, don't speculate. If you
9 know the answer, obviously testify truthfully. But
10 you don't have to speculate if you don't know.

11 A It's the only thing I can think of.

12 Q (Continuing by MR. ALLEN): You have Bridgeport pays a
13 sample fee in some royalty statements. Is that a fee
14 that's paid for sound recordings?

15 A If a sound recording is sampled and another person
16 uses it, they may be paying us a royalty. And maybe
17 that's what that payment is that you're referring to.

18 Q Okay. And how is Mr. Worrell's share of the sample
19 fee calculated?

20 A I --

21 MR. BUSCH: Just note my objection to form
22 of this. There's a lack of foundation. And these are
23 Bridgeport statements I believe you're referring to.

24 MR. ALLEN: I am referring to Bridgeport
25 statements.

1 MR. BUSCH: Okay.

2 A I honestly can't tell you because it all depends on
3 what percentage of the song Bernie had. It's, it's a
4 complicated matter that I think you'd have to sit down
5 and it would take maybe all day to explain it to you.

6 Q (Continuing by MR. ALLEN): And would that be with
7 Mr. Levinson, Ms. Catlett, --

8 A Well, either, --

9 Q -- Mr. Martin?

10 A -- either/or I think.

11 Q How about Mr. Martin, would he know anything about how
12 these are calculated?

13 A He could. I don't know.

14 Q So I'm curious because it's been represented that
15 Bridgeport is a publishing company and it does not
16 license sound recordings, but you've testified about
17 the sampling and karaoke and synch fees being based
18 off of the sound recordings. So is it not true that
19 Bridgeport is solely a publishing company or does --

20 MR. BUSCH: Mr. Allen, Mr. Allen, with all
21 due respect, you're the one that's talking about sound
22 recordings. These are Bridgeport statements. These
23 are all publishing royalties.

24 MR. ALLEN: Sir, you, you don't have any
25 standing whatsoever to be talking and giving answers

1 here. You can give your objection. And you
2 understand the federal rules, as well as anybody else
3 on here. I'm not letting you testify for your client.

4 MR. BUSCH: Mr. Allen, --

5 MR. ALLEN: If you want to object, --

6 MR. BUSCH: -- calm down. Mr. Allen, calm
7 down. Calm down, Mr. Allen.

8 MR. ALLEN: -- you can object to the form
9 of my question but you're not giving answers to
10 Mr. Boladian. That's not why you're here.
11 Mr. Boladian can answer for himself.

12 MR. BUSCH: Mr. Allen, please calm down.
13 I'm sure you want an accurate, I'm you sure you want
14 an accurate record. He told you at the beginning of
15 this deposition of his medical conditions.

16 You're trying to put words in his mouth. I
17 have an obligation to make sure that that doesn't
18 happen, and that's all I'm doing.

19 If you speak to the people who prepared
20 these dates, they can explain everything to you.
21 Mr. Boladian is not the person who understands this.

22 But go ahead, I take your admonition but I
23 just want -- all I'm trying to do is get a clear
24 record so there's no misunderstanding.

25 MR. ALLEN: No, all you're trying to do is

1 testify for your client.

2 MR. BUSCH: No, I'm not. Bridgeport --

3 MR. ALLEN: Whatever you're --

4 (Cross-talking)

5 MR. BUSCH: You're the one that's using the
6 phrase sound recordings over and over again, not
7 Mr. Boladian. You're mischaracterizing his testimony.

8 MR. ALLEN: He's testified already that
9 some of this is for sound recording. That's all --

10 MR. BUSCH: He did not. He did not say
11 that. What he said was that for synch, for example,
12 there's a sound recording component -- you may not be
13 an entertainment lawyer, you may not understand this.
14 But for synch there's a component, --

15 MR. ALLEN: I know, I know you and, --

16 (Cross-talking)

17 MR. BUSCH: -- there's a publishing
18 component.

19 MR. ALLEN: -- and Mr. Hertz and Mr. Quick,
20 we've already established that, you know, in the first
21 week.

22 MR. BUSCH: Okay, let's just keep going. I
23 don't want to waste your time. Let's just keep going,
24 please.

25 MR. QUICK: I'll object to form.

1 MR. HERTZ: If I may just add in one thing.
2 Mr. Allen. If you're referring to specific
3 statements, even though Mr. Boladian can't see them, I
4 think you should show them so that we at least know
5 what it is you're talking about.

6 MR. ALLEN: You produced them, Howard.

7 MR. HERTZ: Well, I don't know what
8 document --

9 (Cross-talking)

10 MR. BUSCH: But we still have the right to
11 see the documents you're questioning the witness
12 about.

13 MR. HERTZ: Normally if we were all in the
14 same room, you would be passing out a copy to each of
15 us.

16 MR. ALLEN: You wanted to do it Zoom,
17 Howard. I just --

18 MR. HERTZ: No, you just put it up on the
19 screen.

20 MR. ALLEN: I'm doing in this deference to
21 you.

22 MR. HERTZ: Put it up on the screen.

23 MR. ALLEN: And I know what you're doing I
24 mean so...

25 MR. HERTZ: What I'm doing?

1 MR. ALLEN: The record, the record will
2 speak for itself.

3 MR. BUSCH: That's fine.

4 Q (Continuing by MR. ALLEN): I'd like to ask you
5 questions, Mr. Boladian, about a settlement agreement
6 that you entered into last year in December, December
7 27th of 2023.

8 I'm trying to get an idea of how that
9 settlement agreement came together. Did you reach out
10 to Ms. Worrell and offer her a settlement; how did
11 that happen?

12 A Which settlement are you talking about, sir?

13 Q There's a settlement agreement -- and, Erik, if you'd
14 like to pull it up for the lawyers that drafted it and
15 want to see it again.

16 MR. QUICK: No evidence of that, Mr. Allen.
17 Why don't you just stick with your questions instead
18 of making your little side comments.

19 MR. BUSCH: Exactly. And I've never --
20 I've been doing this for 30 years. I've never had a
21 deposing attorney refuse to put exhibits up on the
22 screen whether --

23 (Cross-talking)

24 MR. ALLEN: I haven't offered it as an
25 exhibit. And I've never in 30 years deposed a blind

1 client who you've already said can't read the
2 documents up on the screen that you have.

3 MR. BUSCH: What I'm saying is we have the
4 right to see the exhibits you're trying to use.

5 MR. ALLEN: I haven't offered it as an
6 exhibit. I have not offered it as an exhibit.

7 MR. HERTZ: But you're asking questions
8 about it.

9 MR. ALLEN: We're doing our best with the
10 technology as it is.

11 MR. SCHARF: Where's the --

12 MR. ALLEN: It's the December 27 settlement
13 agreement.

14 MR. SCHARF: I know but where is it.

15 MR. ALLEN: Scroll down.

16 MR. SCHARF: Word documents here.

17 MR. ALLEN: No, too far, too far. Up, it's
18 up. Let me see, go ahead and escape it, exit out of
19 your share screen and I'll try and grab it on mine.

20 MR. SCHARF: Exit out.

21 MR. ALLEN: Just hit escape. Just hit
22 escape on your keyboard.

23 MR. SCHARF: Yeah, I did. I can exit out
24 of the entire tab of OneDrive.

25 MR. ALLEN: Go ahead.

1 Sue, I'm having a little trouble sharing.

2 (WHEREUPON an off the record
3 discussion was had with the
4 court reporter.)

5 MR. ALLEN: All right, we might as well
6 mark this, Sue. We've spent enough time looking for
7 it. What is this, three or four?

8 COURT REPORTER: Three.

9 Q (Continuing by MR. ALLEN): Okay. On the screen,
10 Mr. Boladian, is a settlement agreement and release
11 dated 27 December 2023. Do you recall signing that
12 document?

13 A Signing a document but I don't remember which one.

14 Q Okay. Do you recall entering into a settlement
15 agreement and release with the estate of George
16 Bernard Worrell about this time last year on the 27th
17 of December?

18 A Did something, can't quite remember what.

19 Q Okay. So my question, before we took the short break
20 to locate the document, was how did this, how did this
21 settlement agreement come to be?

22 A I was served with some papers, and of course I can't
23 read or see what's what, so I gave them to
24 Mr. Levinson. I said here, you deal with this.

25 Q Okay. So Mr. Levinson did what, as far as you know,

1 in order to bring this agreement to fruition?

2 A As far as I --

3 MR. BUSCH: Armen, before you answer the
4 question, let me just caution you that your
5 communications with Mr. Levinson are privileged. So I
6 would instruct you not to divulge any attorney/client
7 privileged communications.

8 So I just want to give you that warning
9 because I don't want there to be a claim of waiver of
10 privilege here.

11 MR. ALLEN: Yeah, and you'll note I asked
12 what did he do, not --

13 MR. BUSCH: I'm just giving him, you know,
14 the appropriate caution.

15 Q (Continuing by MR. ALLEN): What did you have Mr.
16 Levinson do, sir?

17 A I just told him to deal with it, that was it.

18 Q Okay. And as far as you know, what did he do to deal
19 with the papers that you received?

20 A He handled it in whatever he thought was best.

21 Q Okay. Did he offer Ms. Worrell a settlement?

22 A I don't know what he did, to be honest with you.

23 Q Okay. What is your understanding of the settlement
24 agreement and release that you signed?

25 A That it's all finished.

1 Q What's all finished, sir?

2 A Whatever she was hollering about.

3 Q Okay. And what -- who is the she you're referring to?

4 A I'm sorry, sir?

5 Q Who is the she that you're referring?

6 A Judie Worrell.

7 Q Judie Worrell is the she that you were referring to
8 you that was hollering about something?

9 A Yes.

10 Q How did she holler; did she holler at you or did she
11 holler at somebody else?

12 A I'm just using that as a figure of speech.

13 Q So did you understand that Ms. Worrell, as the
14 administrator of the estate of her husband, sued your
15 record company, Westbound Records?

16 A There was something that took place and I told Mark to
17 handle it.

18 Q Okay. And was it your understanding that that
19 something that happened was a lawsuit?

20 A I'm not completely sure what's what. It's just that
21 it's finished.

22 Q Okay. Did you discuss the situation with Ms. Worrell
23 with anybody else at Westbound Records?

24 A No, I have no conversation with Judie Worrell.

25 Q I asked whether you had -- did you discuss the papers

1 you received from Ms. Worrell with anyone else at
2 Westbound Records?

3 A I don't recall. I just gave it all to Mark. I said
4 here, you deal with this.

5 Q Okay. And is it, is it true that Mr. Busch
6 represented Ms. Worrell in connection with this
7 settlement agreement and release?

8 A I'm not sure what he did.

9 Q Okay. Mr. Busch is listed in the settlement agreement
10 as an attorney, or his law firm, King and Ballow, is
11 listed as an attorney for Ms. Worrell. Do you know
12 that -- did you know that?

13 A Not really.

14 Q And Mr. Busch, is that the same Mr. Busch that's
15 representing you today?

16 A Mr. Busch has been my attorney for 30 years and, and
17 whatever, whatever is, is. What can I say.

18 Q How was it that Mr. Busch became Ms. Worre -- or the
19 estate of Bernard, George Bernard Worrell's attorney?

20 A I don't know.

21 Q Did you provide Mr. Busch's name to Ms. Worrell in
22 connection with her decision to hire him to represent
23 the estate?

24 A I've had no conversation with Ms. Worrell.

25 Q Well, Ms. Worrell was sending you e-mails.

1 A Not to me.

2 Q Well, your attorneys have produced a number of e-mails
3 that bear your e-mail address and relate to a time
4 before I think you were blind.

5 When, by the way, when, by the way, did you
6 become blind; what year was that?

7 A It's going to be eight years this coming April.

8 Q So --

9 A In '25 it's going to be eight years.

10 Q So you became legally blind in 2017, is that your
11 testimony?

12 A Yes.

13 Q Have you employed any form of technology to assist you
14 with reading documents to you, that are presented to
15 you?

16 A No.

17 Q No?

18 A No.

19 Q When you receive a communication from somebody in
20 connection with running your business, how is it that
21 you are informed about the contents of those
22 communications?

23 A Well, they call on the phone.

24 Q Who would call you on the phone?

25 A Whoever is trying to reach me.

1 Q Okay. So is --

2 A Sometimes I get it and sometimes I don't.

3 Q And sometimes what, sir?

4 A Sometimes I get it and sometimes I don't. I can't
5 sometimes even deal with the phone. Even when I go to
6 swipe it, sometimes it doesn't work.

7 Q So who is assisting you in running the business that
8 you, that you own, Westbound Records, in light of your
9 disability, sir?

10 A Sarah Catlett helps quite a bit.

11 Q You said Sarah Catlett?

12 A Yes.

13 Q Okay. So does she read your correspondence?

14 A If there's anything to read.

15 Q Okay. I notice that your address on the settlement
16 agreement is listed at 4301 Orchard Lake Road, suite
17 180 to 239 in West Bloomfield. That's a mail drop,
18 isn't it?

19 A As far as I know.

20 Q Okay. So walk me through the company's process for
21 processing mail.

22 MR. BUSCH: Objection, lack of foundation.

23 A I don't really know because I don't go pick it up. I
24 think you'd have to maybe ask Mr. Levinson or, or
25 Sarah. I never -- I don't drive and I don't go

1 running around. I can barely stand up sometimes. And
2 that's what it is. It's not, not easy getting old,
3 trust me.

4 Q (Continuing by MR. ALLEN): I understand and
5 sympathize with you, sir.

6 But is there a process in place at
7 Westbound Records whereby mail is picked up from the
8 mail drop on Orchard Lake Road and delivered somewhere
9 for someone to read it?

10 A Well, they go and pick it up. I can't tell you who it
11 is exactly. It could be somebody that is sent over to
12 pick it up. I don't, I don't do it.

13 Q Okay. So you don't do it. Who are the employees of
14 Westbound Records today?

15 A Currently there's really no employees. I mean the
16 company's not doing a lot right now. With technology
17 changing so rapidly it's difficult to know which way
18 things are going. Especially with my condition things
19 are not exactly a hundred percent.

20 Q Do you have a payroll, sir?

21 A Do I have a payroll?

22 Q Do you have a payroll, yes, your -- Westbound Records,
23 does it have a payroll?

24 A Not currently. There's no one listed on the payroll
25 that I know of.

1 Q So is Sarah Catlett an employee of Westbound Records?

2 A No.

3 Q Is Mark Levinson a employee of Westbound Records?

4 A No.

5 Q Is Joel Martin a employee of Westbound Records?

6 Mr. Boladian, did you hear my last question?

7 A I said -- you asked me if Mr. Martin was an employee,
8 I said no.

9 Q No, okay. So your testimony is that Westbound Records
10 has no employees?

11 A Currently to my -- best of my knowledge, no.

12 Q Okay. And with respect to the settlement agreement
13 dated December 27, 2023, you don't know who initiated
14 the negotiations that led to that settlement
15 agreement?

16 A No. I gave everything to Mark Levinson, told him to
17 deal with it.

18 Q What role did you play, if any, other than signing the
19 agreement and bringing the settlement agreement and
20 release about?

21 A None.

22 Q I'm sorry?

23 A None.

24 Q Nothing?

25 A Right.

1 Q Okay. So you did not direct anybody to negotiate this
2 agreement for you?

3 A No. Well, I gave it to Mr. Levinson. Whatever he
4 did, he did; if you want to call that negotiating.

5 Q Okay. And was there a negotiation of this agreement
6 between Mr. Levinson and Mr. Busch?

7 A I don't know, sir.

8 Q Have you ever dealt with Daniel D. Quick?

9 A Give me that name again, please.

10 Q Daniel D. Quick.

11 A I don't recall the name.

12 Q Have you ever paid money to Mr. Quick?

13 A I don't know who Mr. Quick is.

14 Q All right. Have you ever made a payment to Dickinson
15 Wright Law Firm?

16 A No.

17 Q Have you ever made a payment --

18 A Oh, excuse me, years ago, maybe 20, 25 years ago I did
19 use Dickinson for something. I can't even remember.

20 Q Would that be Dickinson, Wright, Moon, Van Dusen and
21 Freeman?

22 A Dickinson Wright, correct.

23 Q Okay. So you used Dickinson Wright 20 years ago.

24 Have you ever made a payment to a third party for the
25 benefit of Dickinson Wright?

1 A Not that I know of.

2 Q Okay. Have you -- did you give any directions to
3 anybody in connection with the negotiation of the
4 settlement agreement and release other than your
5 lawyers?

6 A No.

7 Q What is your understanding of what is in the
8 settlement agreement and release?

9 A You know what, I don't even know and don't even care.

10 Q Okay. So you were presented with a document by your
11 attorney and you just signed it, is that your
12 testimony?

13 A Yes, sir.

14 Q Okay. Is that a, is that a typical business practice
15 that you follow is that you just sign what your
16 attorneys put in front of you?

17 A In this particular case there's not much going on
18 anymore, trust me. So he handed me the paper, he
19 said, here, sign it and we're done. I said right and
20 that was it.

21 Q Okay. Who assisted you with signing the paper?

22 A No one.

23 MR. BUSCH: Let me just note that any
24 conversations that occurred would be attorney/client
25 privilege anyways.

1 MR. ALLEN: We understand that and I didn't
2 ask about any conversations.

3 MR. BUSCH: Okay, that's fine.

4 Q (Continuing by MR. ALLEN): Are you aware of whether
5 or not any documents were produced to any party in
6 connection with the negotiation of this settlement
7 agreement?

8 A I have no knowledge, sir.

9 Q Okay. Do you know when you were served with the
10 papers that you gave to Mr. Levinson?

11 A I can't remember.

12 Q Okay. Did you -- who at Westbound would have kept the
13 record of when you received the lawsuit that we're
14 here on today, Judie Worrell versus Clinton, et al?

15 A I gave them all to Mr. Levinson. What he did I don't
16 know and, frankly, don't care.

17 Q How did you get them?

18 A Somebody delivered it.

19 Q Okay. Delivered them how?

20 A I think it was either, either FedEx or, or some, some
21 sort of delivery, maybe a -- somebody came personally.
22 I know I don't remember but it was some -- one of
23 those forms.

24 Q Okay. Who at Westbound, other than Mr. Levinson, has
25 knowledge about the settlement agreement you entered

1 into with the estate of Bernie Worrell?

2 A I don't know who he might have told. I don't know.

3 Q Did you ever discuss the settlement agreement with
4 Ms. Catlett?

5 A You know, I don't even know if we even discussed it.
6 I don't know if we even talked about it.

7 Q What are Ms. Catlett's duties for Westbound Records?

8 A Well, Ms. Catlett, she does -- if you asked her, I
9 think she would give you a better rundown.

10 Q Okay. What is your understanding of what she does?

11 A I mean if I ask her something, she'll usually come up
12 with an answer or try to get an answer. There's not a
13 lot going on right now, like I said.

14 Q Well, there appears to be something going on because
15 you have received an assignment of a number of tracks
16 of music in this, in this settlement agreement that
17 are in dispute in this case. Did you know that? Sir?

18 A No, I said no, sir.

19 Q Oh, so you don't know that Ms. Worrell assigned her
20 rights to many of the tracks that are at issue in this
21 case to your company, Westbound Records?

22 A Like I said, I don't have any contact with Ms. Worrell
23 at all. I don't know, even what's in the paper, I
24 don't care.

25 Q Okay. So if you waived your rights against

1 Ms. Worrell, you don't, you don't care about that?

2 A If I what sir, repeat that.

3 Q Waived your rights against Ms. -- rights to pursue any
4 litigation from the beginning of the world till
5 December 27th, 2023, you don't care about that?

6 A I don't understand your question, sir.

7 Q Well, I'm reading from the document. It says that you
8 are waiving your rights for any and all causes of
9 action, lawsuits, so on and so forth from the, from
10 the beginning of the world until December 27, 2023.
11 That, that doesn't -- you don't care about that?

12 A If I should sue her for something, is that what you
13 mean?

14 Q No, I'm -- you made the comment that you don't care
15 what's in the document.

16 A Right.

17 Q And I'm asking you a specific question about something
18 that's in the document and whether you care about
19 that.

20 A I don't even know. Whatever's in there is in there.
21 Mark, I trust him and I don't care after that.

22 Q Okay. So did you care that Ms. Worrell had sued you
23 or sued your company, Westbound Records, in this
24 lawsuit?

25 A Oh, she did obviously and Mark took care of it.

1 Q Who took care of it, Mr. Mark, Mark Levinson?

2 A Mark Levinson, right.

3 Q Okay. So if Mr. Levinson took care of the document,
4 why is Mr. Busch's name on the document for the estate
5 of Judith Worrell, do you know?

6 A I don't know.

7 MR. QUICK: Objection.

8 MR. BUSCH: Objection.

9 Q (Continuing by MR. ALLEN): What do you know about the
10 decision that was made to include some tracks that are
11 -- or some works that are at issue in this case and
12 not others?

13 A I don't, like I said, I don't even know what's in the
14 paper, sir.

15 Q What is the corporate form of Westbound Records, is it
16 an S corp, is it a C corp, is it an LLC; what is it?

17 A To the best of my knowledge, from what my accountant
18 says, it's an S corp.

19 Q Okay. Where is it incorporated, Michigan?

20 A Michigan, yeah.

21 Q Yes?

22 A Yes.

23 Q Okay. And you were the person who incorporated it,
24 correct?

25 A Years ago.

1 Q Okay. Who are the officers of Westbound Records?

2 A Well, I think I'm still president. I'm not even sure
3 anymore, to be honest with you. Like I said, there's
4 not that much activity.

5 Q Is there a secretary or -- secretary of the
6 corporation?

7 A I think there is.

8 Q Okay. Is there a treasurer of the corporation?

9 A I don't think -- they died, yeah.

10 Q Vice president of the corporation?

11 A I don't know what's been brought up to date, sir.

12 Q Okay. And do you have a board of directors?

13 A Me.

14 Q Okay.

15 MR. QUICK: Mr. Allen, I'm sorry to
16 interrupt. Just for the record, you know, this has
17 been going on for, for some time and I just don't want
18 silence to sound as if I am acquiescing in the scope
19 and nature of the questions that you are asking;
20 which, in my view, are far outside the bounds of what
21 was ordered by Magistrate Judge Grand. And, in any
22 event, are relevant to the actual case that this
23 deposition's being taken in.

24 So I'm not asking you to agree with me, I
25 just wanted to make a statement on the record while

1 this continued on, thank you.

2 MR. BUSCH: And, Mr. Quick, thank you for
3 that and, Mr. Allen, because I was about ready to say
4 that. I don't see what any of this has to do with
5 this case.

6 You seem to be asking questions that have
7 nothing to do with this case but are -- and are far
8 afield from the reason you got the right to take this
9 deposition in the first place.

10 So at some point, very shortly, I'm about
11 to instruct the witness not to answer anymore
12 questions unless you get to relevant information.

13 MR. ALLEN: Well, I would love for you to
14 direct the witness to not answer a question because
15 that would be a violation of our local rules. I
16 don't, I don't know if you've read them.

17 MR. BUSCH: Well, if you're harassing him,
18 which you're doing --

19 MR. ALLEN: I'm not harassing him.

20 MR. BUSCH: I believe it --

21 MR. ALLEN: I'm not --

22 (Cross-talking)

23 MR. BUSCH: Why won't you let me finish my
24 statement and you're free to respond.

25 I believe you are harassing him. He is

1 90-years-old. He is completely blind. He told you he
2 has some dementia, and you're asking him about things
3 that have really nothing do with this case whatsoever,
4 not the merits of it at all.

5 And so when a lawyer is harassing a
6 witness, it is my obligation to stop that from
7 happening. And if it requires an instruction not to
8 answer, that is what I will do. And you're free to
9 take it to the magistrate. But Mr. Quick is
10 correct --

11 MR. ALLEN: I'd love for you to go to the
12 magistrate.

13 MR. BUSCH: That's fine. I'm not scared of
14 you, Mr. Allen. Mr. Allen, you started this
15 deposition by threatening me and you continue to do
16 so. And I'm not scared of you, just please ask the
17 questions that you have that are relevant to this
18 case. That's all I'm asking you.

19 Q (Continuing by MR. ALLEN): Sir, you're the sole owner
20 of Westbound Records, are you not?

21 A Yes, sir.

22 Q Okay. And other than yourself and Mr. Levinson is
23 there anybody else that has any information about the
24 manner in which Westbound Records conducts its
25 business?

1 MR. BUSCH: That question's been asked and
2 answered. He also said Sarah Catlett may. But you
3 can answer the question again, Armen.

4 A Well, that's it. You asked me, you got it right
5 there.

6 Q (Continuing by MR. ALLEN): Does Westbound Records
7 have an office other than the post office drop on
8 Orchard Lake Road?

9 A No, we closed it down.

10 Q So how did you meet George Clinton?

11 A We got to go back to the '60's.

12 Q Okay.

13 A George, George had recorded a song for Revilot
14 Records, I Want to Testify. And at that time we had a
15 distributorship, a record distributorship, and we
16 distributed a label called Revilot.

17 Q Okay.

18 A Mr. Clinton was a member of the group Parliaments and
19 they were the artist on the recording, I Want to
20 Testify. And that's how I met him.

21 Q So you met him in connection with the distribution of
22 that, of that song, correct?

23 A Another record company, Revilot.

24 Q Okay. And how did it come to pass that you and
25 Mr. Clinton did business together?

1 A Well, I saw -- I liked the music. And George was
2 always looking for additional opportunities. And
3 after a year or two after they had their run with I
4 Want to Testify, the idea came up of using the band
5 that backed the Parliament to call them Funkadelic.

6 I did not pick the name, by the way. I
7 believe Billy Nelson had thought of the name, one of
8 the members of the group at that time. And that's how
9 we decided to try to work together and do some
10 recordings under the name Funkadelic. That's how it
11 began.

12 Q And at some point you started Westbound Records and
13 you started to cut music with Mr. Clinton, correct?

14 MR. BUSCH: Object to the form of the
15 question.

16 A Well, we had a couple of other artists before
17 Funkadelic.

18 Q (Continuing by MR. ALLEN): Okay. And you claim
19 ownership through your companies of several sound
20 recordings that Mr. Clinton or his groups have made.
21 Do you have a recollection of which recordings, sound
22 recordings, you claim ownership interest in?

23 MR. BUSCH: Object to the form of the
24 question. The documents, the agreements, speak for
25 themselves.

1 MR. ALLEN: The agreements you haven't
2 produced.

3 MR. BUSCH: I don't know, I don't know
4 what's been produced and what hasn't been produced,
5 but there are agreements with Funkadelic so...

6 Q (Continuing by MR. ALLEN): Where would I find those
7 agreements, Mr. Boladian?

8 A I'm sorry?

9 Q Where would I find those agreements that Mr. Busch is
10 referring to?

11 A I don't know.

12 Q Who has those agreements?

13 A I have no idea right now.

14 Q Okay. But it is your testimony that you claim
15 ownership of several sound recordings that Mr. Clinton
16 created, correct?

17 MR. BUSCH: Object to the form. Object to
18 the use of the, use of the word Mr. Clinton. He said
19 it was Funkadelic.

20 A Be more specific with titles. I mean they recorded
21 for different companies, okay. So we don't own all of
22 them. Other companies own other recordings by
23 Funkadelic.

24 Q (Continuing by MR. ALLEN): Okay. And you collect
25 royalties on the sound recordings that you claim own

1 -- that your companies claim ownership in, don't you?

2 A If there's any royalties to be paid or had.

3 Q Okay. Mr. Clinton doesn't receive those royalties,
4 does he?

5 A No guarantee. I don't know what Mr. Clinton received.

6 Q You don't share sound recording royalties on the songs
7 you claim ownership in with Mr. Clinton, do you?

8 A Currently, no.

9 Q Okay. So on the songs that you claim -- or that your
10 companies claim ownership in, you are the sole
11 recipient -- they are the sole recipient of the sound
12 recording royalties, correct?

13 MR. BUSCH: Object to the form of the
14 question, mischaracterizes his testimony.

15 A I think you need to be specific. It's a broad, broad
16 question, you know.

17 Q (Continuing by MR. ALLEN): Okay.

18 MR. BUSCH: Mr. Allen, just in the -- going
19 forward, and I'm not trying to tell you what to do,
20 but in the music business songs are generally referred
21 to as -- compositions refer to songs and sound
22 recordings are not recordings. So if you want to be
23 specific, I would appreciate using those -- that --
24 those terms, but you can do what you want.

25 Q (Continuing by MR. ALLEN): Do you receive royalties

1 for Mommy, What's a Funkadelic, I'll Bet You? I'm
2 saying -- when I'm referring to you, I'm talking about
3 Westbound.

4 MR. BUSCH: And are you referring to both
5 either sound recording or publishing or both?

6 MR. ALLEN: I'm talking about the sound
7 recording, sir.

8 MR. BUSCH: Okay, thank you.

9 A We have in the past.

10 Q (Continuing by MR. ALLEN): Do you share those
11 royalties with Mr. Clinton?

12 A Currently, no.

13 Q Okay. Do you receive sound recording royalties for
14 Music -- or when I'll reference you, I'm referring to
15 Westbound Records, Music For My Mother?

16 A You know what, I don't know, sir, currently what still
17 comes in and what is no longer earning anything. I
18 can't tell you.

19 Q So let me ask you this. Do you share the royalties
20 that you receive for any Funkadelic sound recording
21 with Mr. Clinton?

22 A No.

23 Q Okay. So if there is income coming in on the sound
24 recordings, if there's royalties coming in on the
25 sound recordings for Funkadelic music sound

1 recordings, you're not sharing that with Mr. Clinton?

2 A No.

3 Q Okay. Do you recall a record called Free Your Mind
4 and Your Ass Will Follow?

5 A I recall the title, yes.

6 Q Okay. And you claim the ownership in the sound
7 recordings for that, do you not, Westbound does?

8 A Yes.

9 Q How about Maggot Brain, do you claim that Westbound is
10 the owner of the sound recordings in -- or for Maggot
11 Brain?

12 A Yes.

13 Q Okay. Did you acquire your rights to the sound
14 recordings through fraud or misrepresentation?

15 MR. BUSCH: Object to form.

16 A Through misrepresentation?

17 Q (Continuing by MR. ALLEN): Fraud or
18 misrepresentation.

19 MR. BUSCH: Can you explain to me --

20 A Did --

21 MR. BUSCH: Go ahead, Mr. Boladian, answer
22 the question, then I have a question for Mr. Allen.

23 MR. HERTZ: Why don't you repeat the
24 question.

25 MR. BUSCH: Repeat the question, please.

1 MR. ALLEN: Go ahead, Sue, repeat the
2 question.

3 (WHEREUPON the reporter read
4 back the question as follows):

5 QUESTION: "Did you acquire your rights to the sound
6 recordings through fraud or
7 misrepresentation?"

8 A No.

9 Q (Continuing by MR. ALLEN): So --

10 MR. BUSCH: Mr. Allen, wait, wait one
11 second before you ask your next question. Mr. Allen,
12 I don't know if you know this or not but Mr. Clinton
13 and Mr. Boladian have had litigation over the last --

14 MR. ALLEN: I'm well aware of it

15 MR. BUSCH: And Mr. Clinton, --

16 MR. ALLEN: I'm well aware of it.

17 MR. BUSCH: -- Mr. Clinton -- excuse me.

18 MR. ALLEN: You're testifying, you're
19 testifying --

20 (Cross-talking)

21 MR. BUSCH: Let me finish. I'm going to
22 stop you from questioning --

23 MR. ALLEN: No, you are testifying so he
24 won't testify and I'm have an obligation to stop you
25 from testifying.

1 MR. BUSCH: No, I'm testifying.

2 MR. ALLEN: When I ask about --

3 (Cross-talking)

4 MR. BUSCH: Excuse me, calm down. I'm not
5 testifying. There's no question pending.

6 MR. ALLEN: Place your objection on the
7 record but don't testify for the witness.

8 MR. BUSCH: I'm not testifying.

9 MR. ALLEN: Or lead the information that
10 you're giving.

11 MR. BUSCH: Okay, are you going to let me
12 -- we're not going to continue until you let me make
13 my statement on the record.

14 MR. ALLEN: You are leading your witness
15 and --

16 MR. BUSCH: I am not. There's another
17 question pending.

18 MR. ALLEN: -- it's not even your turn.

19 MR. BUSCH: Mr. Allen, my only point was to
20 say to you, this case is not about those allegations
21 that have been litigated and Mr. Clinton lost.

22 This case is about Ms. Worrell's claims
23 against Mr. Clinton and I'm not going let you
24 re-litigate things here or ask questions that have
25 nothing to do with this case.

1 MR. ALLEN: You're, you are absolutely
2 wrong about that, Richard.

3 MR. BUSCH: Explain to me how this is
4 relevant to the case.

5 MR. ALLEN: I will explain it to you, okay.
6 There have been allegations that, that Mr. Clinton
7 improperly, through his fraud, gave rights to sound
8 recordings to record companies. That is a direct
9 allegation in this case.

10 I'm asking about an allegation that has
11 been made by the plaintiff in this case. And I
12 assumed that Mr. Boladian was going to give the answer
13 that he gave, which is that it's his testimony that he
14 did not acquire his rights to the sound recordings
15 through fraud or misrepresentation.

16 MR. BUSCH: Okay.

17 MR. ALLEN: So you just wasted five
18 minutes --

19 MR. BUSCH: I'm not following --

20 MR. ALLEN: -- of my deposition time.

21 MR. BUSCH: -- how one flows -- I don't
22 understand how one -- excuse me. I don't understand
23 how one flows from the other. I don't understand how
24 the allegation against Mr. Clinton in this -- by the
25 plaintiff in this case that -- your questioning

1 Mr. Boladian flows from that but, but if you're moving
2 on and going onto now the allegations of this case,
3 then fine.

4 Q (Continuing by MR. ALLEN): Mr. Boladian, it's your
5 testimony that, that your acquisition of your rights
6 to sound recordings was done in a legal manner,
7 correct?

8 MR. BUSCH: You just asked him that
9 question literally.

10 MR. ALLEN: No, I didn't.

11 MR. BUSCH: Okay.

12 MR. QUICK: Form and foundation.

13 A As far as I know.

14 Q (Continuing by MR. ALLEN): Okay. So if Ms. Worrell
15 alleges in this case that you acquired your interest
16 in sound recordings through fraud and
17 misrepresentation, you disagree with that allegation,
18 correct?

19 MR. QUICK: There's no allegation, --

20 MR. BUSCH: There's no allegation of that.

21 MR. QUICK: -- there's no allegation of
22 fraud by Mr. Boladian that's relevant to this case.

23 MR. BUSCH: You've missed -- you've just
24 misrepresented the record, Mr. Allen, and I don't
25 appreciate it.

1 MR. ALLEN: You can answer the question,
2 sir.

3 MR. BUSCH: It's impossible to answer
4 because there's no such allegation.

5 A I have no answer for you, sir.

6 Q (Continuing by MR. ALLEN): I think your attorney
7 answered for you, as what he's been doing.

8 MR. BUSCH: You just made up an allegation
9 that doesn't exist.

10 MR. ALLEN: No, I didn't. No, I didn't.
11 If George Clinton, if George Clinton engaged in fraud,
12 there was somebody on the other side of the fraud and
13 that's Mr. Boladian. So if the allegation's --

14 MR. BUSCH: That sounds like a re --
15 (Cross-talking)

16 MR. ALLEN: -- the allegation, it's got to
17 involve Boladian. And if Boladian is saying --

18 MR. BUSCH: Tell it to the jury. Tell it
19 to jury and the court. That sounds ridiculous. So
20 tell it to the jury and the court. That sounds --

21 MR. ALLEN: There won't be a jury in front
22 of us. There won't be a jury in this case.

23 MR. BUSCH: Tell it to the court, tell it
24 to the judge, can't wait.

25 Q (Continuing by MR. ALLEN): Have you any documents,

1 other than what's been produced, Mr. Boladian,
2 relating to Mr. Clinton's employment with Westbound
3 Records?

4 MR. BUSCH: Object to form.

5 MR. QUICK: Join.

6 Q (Continuing by MR. ALLEN): I didn't hear your answer.

7 A I currently have no documents. I, I don't have
8 anything right now.

9 Q Okay. Where did the documents -- where did the
10 records for Westbound Records go if you don't have
11 them anymore?

12 A I don't know.

13 Q Was there an office manager employed at the time that
14 you disposed of the documents?

15 MR. BUSCH: Object to form. He never said
16 he disposed of documents.

17 A There was an office manager but as we moved several
18 times over the last 60 years, things get lost and they
19 just disappear or get lost.

20 Q (Continuing by MR. ALLEN): Okay. When was the last
21 time Westbound Records moved from its prior location?

22 A Before COVID.

23 Q Okay. So would that have been in 2019?

24 A I, I'm not sure but somewhere around there.

25 Q All right. And was that when you started using the

1 address at 4301 Orchard Lake Road?

2 A Even before that, before '19.

3 Q Okay. How long has the registered office of Westbound
4 Records been at 4301 Orchard Lake in West Bloomfield?

5 A I don't know for sure.

6 Q I'm sorry?

7 A I don't know for sure.

8 Q Were you blind when the -- you testified earlier that
9 you think that 2017 is when you became blind I
10 believe?

11 A Yes.

12 Q Were you blind the last -- when you moved to 4301
13 Orchard Lake Road, would that help place the time?

14 A Starting in '17. What happened after that I don't
15 know.

16 Q Okay. Prior -- what location was Westbound Records --
17 or where was Westbound Records located prior to being
18 located at 4301 Orchard Lake Road?

19 A 15500 West Ten Mile Road, Southfield, Michigan.

20 Q And who were the employees at the time of -- who were
21 the employees of Westbound Records at the time that
22 you -- or that it was located on West Ten Mile Road?

23 A Hazel Hollenquest.

24 Q Hazel Hollenquest, who else?

25 A That was it.

1 Q Did Ms. Hollenquest have any duties with respect to
2 recordkeeping?

3 A No. She, she retired even before we moved. She
4 retired I think it was a couple of years -- in 2 -- I
5 think it was the end of '14 or '15 she retired.

6 Q How did you get to -- how were you introduced to
7 Bernie Worrell?

8 A I don't remember exactly.

9 Q Do you recall an approximate year when you would have
10 been introduced to Mr. Worrell?

11 A Do I recall what, sir?

12 Q An approximate year in which you were introduced to
13 Mr. Worrell.

14 A It was somewhere around '68 or '69.

15 Q Okay. And what context were you introduced to
16 Mr. Worrell?

17 MR. BUSCH: Object to form.

18 A I don't know.

19 MR. BUSCH: Could you clarify that,
20 Mr. Allen. It's been 60 years. Could you clarify
21 like exactly what you mean, in what context.

22 MR. ALLEN: Well, it's actually not 60.

23 MR. BUSCH: Fifty-five.

24 MR. ALLEN: Right.

25 Q (Continuing by MR. ALLEN): Did you meet him at the

1 studio, sir?

2 A I can't remember where it was.

3 Q Okay. Did you meet him in connection with his work
4 with Parliament?

5 A Funkadelic.

6 Q Funkadelic, okay.

7 A It would have been -- I mean that would have been the
8 only reason.

9 Q What was the extent of your working relationship with
10 Mr. Worrell?

11 A Fine. Bernie was a wonderful guy, very nice, very
12 talented musician.

13 Q Did you ever have any discussions with Mr. Worrell
14 about his complaints that he was not receiving the
15 royalties to which he thought he was entitled?

16 A No.

17 Q So would the extent of your discussions about
18 royalties owing to Mr. Worrell have been solely with
19 Ms. Judith Worrell?

20 MR. BUSCH: Object to form, --

21 MR. QUICK: Can I just --

22 MR. BUSCH: -- lack of foundation. Go
23 ahead, Dan.

24 MR. QUICK: Yeah, I'm sorry, Jim. Would it
25 be helpful to clarify whether you're referencing

1 complaints that Mr. Worrell was not being -- was due
2 something from Mr. Boladian's entities, or due
3 something from Mr. Clinton or somebody else? That's a
4 big distinction.

5 MR. ALLEN: I'm talking about disputes that
6 Mr. Worrell had with Mr. Boladian or his entities.

7 MR. QUICK: Okay, thank you very much.

8 A I don't remember a lot of that. I just remember
9 Bernie was a nice guy and very talented.

10 Q (Continuing by MR. ALLEN): And you remember no
11 discussions with his wife about claims that she made
12 -- she was making about not receiving royalties from
13 you or one of your firms that she felt he was entitled
14 to?

15 A No.

16 Q Who else at Westbound Records would have information
17 about Mr. Worrell's relationship with Westbound?

18 A It would have been Bernie Mendelson but he's deceased.
19 Everybody -- anyone that was in and out of there is
20 either dead or, you know, in bad shape health-wise.

21 Q Okay. Did you consider him to be a good employee?

22 MR. BUSCH: Object to the form. Object to
23 the use of the word employee.

24 MR. QUICK: Join.

25 A Who are you referring to?

1 Q (Continuing by MR. ALLEN): Mr. Worrell.

2 A You mean as being a good employee?

3 Q Yeah.

4 A Not really an employee, he was under contract as a
5 musician and he would get paid for his services. But
6 he was not a direct employee of Westbound.

7 Q So you take issue with the characterization on the
8 American Federation of Musicians documents that have
9 him listed as an employee?

10 MR. BUSCH: Object to form.

11 A It's a term they use but my sense of employee would be
12 a W2 where you take out the taxes, the proper taxes
13 and send them to the government and issue a W -- a
14 statement at the end of the year and all that.

15 We did not do that with Bernie. He got
16 paid as a contract musician and he filed his own taxes
17 and did his own, you know, paperwork, whatever. I had
18 nothing to do with that.

19 Q (Continuing by MR. ALLEN): Who would have, who would
20 have his 1099s or W2s?

21 MR. BUSCH: Object to form.

22 A I don't, I don't know.

23 Q (Continuing by MR. ALLEN): From West -- that
24 Westbound issued?

25 MR. QUICK: Object as to facts not in

1 evidence, but go ahead.

2 MR. BUSCH: Yeah, lack of foundation and
3 assuming facts not in evidence.

4 A I don't know.

5 Q (Continuing by MR. ALLEN): So when you signed, when
6 you signed the American Federation of Musician
7 contract 103107 in 1976 listing Mr. Worrell as an
8 employee of Westbound Records, were you falsifying a
9 record, or what -- why would you sign a document, why
10 would you sign a document that lists Bernie Worrell as
11 an employee of Westbound Records?

12 MR. BUSCH: Object to form, argumentative
13 and it's -- well, I'll leave it at that. Object to
14 form and argumentative.

15 MR. QUICK: Join.

16 A If I'm, if I'm correct, the union is indicating that
17 if they did work for us, that they would be -- he
18 would be an employee. And to a certain extent they're
19 correct, he was an employee for that particular
20 session.

21 Q (Continuing by MR. ALLEN): Correct.

22 A Right. WATCH.

23 Q As were the other musicians, likewise named on the
24 American Federation of Musicians --

25 A All the other, --

1 Q -- contract?

2 A -- all the other --

3 MR. BUSCH: Armen, one second. Let me just
4 get my objection in, please, before you answer.

5 MR. ALLEN: Go ahead and speak. Go ahead
6 and testify for him, Richard. You've been doing it
7 all day.

8 MR. BUSCH: I'm not, I'm not. I'm not
9 going to say a word other than objection --

10 MR. ALLEN: There's a local, --

11 MR. BUSCH: Excuse me.

12 MR. ALLEN: -- there's a local rule direct
13 to the point. You're not allowed, --

14 MR. BUSCH: You know, you spend more time
15 arguing with me.

16 MR. ALLEN: -- you're not allowed to do
17 this. You are, --

18 MR. BUSCH: Objection, --

19 MR. ALLEN: -- you are testifying --

20 MR. BUSCH: -- objection.

21 MR. ALLEN: -- for your witness. It's
22 totally inappropriate.

23 MR. BUSCH: All I'm doing is making my
24 legal objection, calm down. Objection, lack of
25 foundation and it calls for a legal conclusion.

1 I'm allowed to make a legal objection, and
2 the witness began answering before I had a chance to
3 get it in. I'm just saying wait until I get my
4 objection out, answer the question.

5 You can answer, Armen. I just want to get
6 my legal objection in.

7 A All right. As we paid Bernie Worrell, all the other
8 musicians were paid as well. That's all I have to say
9 really.

10 Q (Continuing by MR. ALLEN): Did Westbound control any
11 payment sent to Dickinson Wright in connection with
12 this litigation?

13 A No. I think I told you earlier we did not.

14 Q Okay. Did you personally direct any payment to
15 Dickinson Wright?

16 A No.

17 Q Did you send any payment to any third party to pay
18 Dickinson Wright?

19 A No.

20 Q And is it your testimony that you are in no way, shape
21 or form financing the litigation that Judith Worrell
22 has brought against Mr. Clinton?

23 A Absolutely not.

24 Q You've not paid for any expert witnesses in this case?

25 A No.

1 Q Either you or your company?

2 A No.

3 Q So do you like Mr. Clinton?

4 A Do I like him?

5 Q Yeah.

6 A I mean George is okay, yeah. I mean, you know, other
7 than his business practices. As a person, he's fine.
8 I mean during the old days we had good times together.

9 Q Why did you throw him out of that -- why did you throw
10 him out of his house?

11 MR. BUSCH: Objection. That's prior
12 litigation. Don't answer the question, Armen. I'm
13 done with this.

14 You're not going to ask him questions like
15 that, no. That, that case was litigated, Mr. Clinton
16 lost. There's a record about all the things
17 Mr. Clinton did. He's lost every case he's filed
18 against Mr. Boladian and we're not going re-litigate
19 those cases here, I'm sorry.

20 Q (Continuing by MR. ALLEN): Did you like him when you
21 threw him out of his house?

22 MR. BUSCH: Objection. Do you want to hear
23 why he threw him out of his house, or why he threw him
24 out of Armen's house? Anyways --

25 MR. ALLEN: You can ask him questions if

1 you want.

2 MR. BUSCH: I'm not -- listen, no, this has
3 no relevance --

4 MR. ALLEN: You can ask him questions --

5 MR. BUSCH: This has no relevance. I'm
6 instructing him not to answer.

7 MR. ALLEN: You've instructed your client
8 to testify about all questions I asked.

9 MR. BUSCH: You made -- you got a court
10 order to allow this deposition under specific reasons
11 and for explicit purposes. Re-litigation of --

12 MR. ALLEN: We're going to --

13 MR. BUSCH: -- over the last 29, 30 years
14 is not going to be part of this deposition, I'm sorry.

15 Q (Continuing by MR. ALLEN): Do you think Mr. Clinton
16 is dishonest, Mr. Boladian?

17 A I don't think intentionally he's dishonest. I don't
18 think intentionally he's dishonest.

19 Q Okay. Do you think he engaged in crimes or fraud?

20 MR. BUSCH: Object to form.

21 MR. QUICK: And foundation.

22 MR. BUSCH: And foundation, lack of
23 foundation.

24 MR. HERTZ: Time periods, what are you
25 talking about?

1 A Be more specific, are you talking about going around
2 and killing people or, or something like that? I mean
3 be a little more specific.

4 Q (Continuing by MR. ALLEN): I just asked whether you
5 thought that he engaged in any criminal activity?

6 MR. BUSCH: Object to form, lack of
7 foundation.

8 MR. QUICK: Join.

9 A Like what, can you be more specific?

10 Q (Continuing by MR. ALLEN): I don't have any
11 specifics. I'm asking you whether you think he's
12 engaged in any criminal activity?

13 MR. BUSCH: Object to form, lack of
14 foundation. And again this has nothing to do with why
15 you are deposing Mr. Boladian whatsoever.

16 A No, I don't -- not that I know of, let's put it that
17 way. I'm not with George 24 hours a day; furthermore,
18 I have my own problems to deal with, okay, really.

19 Q (Continuing by MR. ALLEN): Do you have any evidence
20 that Mr. Clinton defrauded Judie Worrell -- I'm sorry,
21 Bernie Worrell, the estate of Bernie Worrell?

22 A No, I don't

23 MR. BUSCH: Object to form, lack of
24 foundation.

25 MR. QUICK: Join.

1 Q (Continuing by MR. ALLEN): Do you have any evidence
2 that Mr. Clinton defrauded Bernie Worrell?

3 A I have -- I don't know. I have no idea.

4 MR. BUSCH: And Mr. Boladian is, I'm sorry,
5 Mr. Boladian is not even a voluntary witness. He has
6 not come forward and said I'm testifying on behalf of
7 Judie Worrell, he's not.

8 You took his deposition. He is not a
9 witness in this case. You insisted on his deposition
10 for specific purposes. You're going well beyond what
11 you represented to the court was the need for this
12 deposition, well beyond.

13 MR. ALLEN: Well, we won't talk about
14 representations to the court until we're before the
15 court the next time. And we'll have that, we'll have
16 a full discussion about representations that have been
17 made to the court.

18 MR. BUSCH: I have no idea what you're
19 talking about.

20 MR. ALLEN: Well, you will soon.

21 MR. BUSCH: Okay.

22 Q (Continuing by MR. ALLEN): So, Mr. Boladian, my
23 question is do you think that Mr. Clinton defrauded
24 Mr. Worrell out of any money?

25 MR. QUICK: Form and foundation.

1 MR. BUSCH: He just answered the question,
2 asked and answered.

3 A You know what, I have no idea what their, what their
4 agreements were or what -- I don't know.

5 Q (Continuing by MR. ALLEN): So you have no evidence
6 that Mr. Clinton did anything dishonest towards
7 Mr. Worrell?

8 A I don't know.

9 MR. BUSCH: Object to form, lack of
10 foundation.

11 A I don't know.

12 Q (Continuing by MR. ALLEN): You don't know that --
13 wait, wait, wait. My question was -- Sue, read my
14 question back.

15 (WHEREUPON the reporter read
16 back the question as follows):

17 QUESTION: "So you have no evidence that Mr. Clinton
18 did anything dishonest towards
19 Mr. Worrell?"

20 A I don't know.

21 Q (Continuing by MR. ALLEN): So you have no evidence
22 that he did anything dishonest towards Mr. Worrell,
23 correct?

24 A I don't know.

25 MR. QUICK: Form and foundation.

1 A I don't know.

2 Q (Continuing by MR. ALLEN): You don't know whether you
3 have information or evidence, or you don't know of
4 any, you don't know of any dishonest activity that
5 Mr. Clinton engaged in towards Mr. Worrell, which one
6 is it?

7 A I don't know. I don't know.

8 Q Do you think Mr. Clinton cheated anybody else?

9 MR. BUSCH: Object to form, lack of
10 foundation.

11 A I don't know that either.

12 Q (Continuing by MR. ALLEN): Do you have any evidence
13 that Mr. Clinton has cheated anybody?

14 MR. BUSCH: Object to form, lack of
15 foundation.

16 A I don't know what George's dealings were with other
17 people.

18 Q (Continuing by MR. ALLEN): Right. So one of the
19 things I'm entitled to ask a witness is whether they
20 have evidence of things that have been alleged in the
21 Complaint, Mr. Boladian. So I'm asking you whether
22 you have any evidence whether Mr. Clinton engaged in
23 any dishonest actions towards any third party?

24 A I don't know that either.

25 Q Do you have any other reasons to suspect that

1 Mr. Clinton is a disreputable person?

2 MR. BUSCH: Object to form.

3 A Repeat that again, please.

4 Q (Continuing by MR. ALLEN): Do you have any evidence
5 that Mr. Clinton is a disreputable person?

6 MR. BUSCH: Object to form.

7 A Do I have any evidence?

8 Q (Continuing by MR. ALLEN): Yes.

9 A No.

10 Q I'll be with you in one second here. Here we go.

11 How would you describe Eddie Hazel's
12 contribution to the song Maggot Brain?

13 MR. BUSCH: Object to form, lack of
14 foundation. Don't speculate or guess.

15 A Eddie was a premier main artist on that particular
16 recording so he contributed a lot. There was a lot of
17 feeling, a lot of creative work. Bernie did a -- I'm
18 sorry, Eddie did a magnificent job.

19 Q (Continuing by MR. ALLEN): Okay. And was his work
20 enhanced by some technological innovations that
21 Mr. Clinton made on that solo?

22 MR. BUSCH: Object to form, lack of
23 foundation.

24 A Not that I know of.

25 Q (Continuing by MR. ALLEN): So do you recall what

1 Mr. Clinton's contribution was to the song?

2 A He added some -- a verse to it. I don't even recall
3 what the verse was. I'm drawing a blank.

4 Q Okay. Who is Garry Shider?

5 A Garry Shider was another member of, of the Parliament.

6 Q And what was his contribution to Maggot Brain, the
7 song?

8 MR. BUSCH: Object to form, lack of
9 foundation.

10 A I don't know what Garry exactly did on that.

11 Q (Continuing by MR. ALLEN): Would you agree with me
12 that there were several important components to that
13 particular track --

14 MR. BUSCH: Object to form.

15 Q (Continuing by MR. ALLEN): -- that were contributed
16 -- I'm not done with my question.

17 MR. BUSCH: I apologize.

18 Q (Continuing by MR. ALLEN): That were contributed by
19 various members of the group?

20 MR. BUSCH: Object to form, lack of
21 foundation.

22 A I mean that goes back many, many years. I really
23 can't honestly tell you.

24 Q (Continuing by MR. ALLEN): Okay. Can you recall with
25 specificity the musical contributions made by any

1 member on any Funkadelic sound recording sitting here
2 today?

3 A They kind of worked as a unit, as a group. And one
4 may have done a little more solo on one song and
5 another may have been a little more prominent on
6 another song. So, you know, hard to tell.

7 Q You were -- or the group was fortunate in that it had
8 several very talented musicians, correct?

9 A Yes.

10 Q Okay. And would you agree with me that all of them
11 could lay, lay claim to being the integral parts of
12 vari -- of any of the tracts that they recorded?

13 MR. BUSCH: Objection, foundation,
14 compound, calls for a legal conclusion.

15 MR. QUICK: I join, lack of foundation.

16 A Each musician performed their particular part. And if
17 they did a particular solo on a song, then of course
18 that would stand out. But on another track could have
19 been another musician, on another track another
20 musician. But they worked very well together and that
21 was it really. And they liked one another.

22 Q (Continuing by MR. ALLEN): How do you receive revenue
23 from the sound recordings that you claim ownership
24 interest in?

25 A How do we receive revenues?

1 Q Yeah.

2 A If there's record sales, which are diminishing more
3 and more by the day, that would be it. Record shops
4 have closed down left and right across the country.

5 MR. BUSCH: Mr. Allen, can we take a five
6 minute break. I just have to use the restroom. If we
7 could take five minutes, I'd appreciate it. We've
8 been going for two hours.

9 MR. HERTZ: I second that emotion.

10 MR. ALLEN: Sure.

11 MR. BUSCH: Okay, thank you very much.

12 (WHEREUPON a short pause was
13 had in the proceedings.)

14 Q (Continuing by MR. ALLEN): Mr. Boladian, is anybody
15 in the room with you?

16 A I don't think so, no. Well, anybody here? I don't
17 think so.

18 MR. ALLEN: Mr. Busch, is it your position
19 that you're going to instruct your client not to
20 answer any questions about the prior litigation
21 history between Mr. Boladian and Mr. Clinton?

22 MR. BUSCH: Yes. That's outside the realm
23 of the reason the deposition was ordered. And there's
24 been so many litigations so, yes, that is my, that is
25 my intent.

1 MR. ALLEN: And it is also your intent to
2 instruct your client not to testify about Westbound's
3 corporate structure because you believe that that --
4 you believe that to be beyond the scope of the court's
5 order?

6 MR. BUSCH: I don't believe I instructed
7 him not to answer anything about Westbound's corporate
8 structure. In fact I believe you asked him about that
9 and he answered to the best of his ability on numerous
10 -- to numerous questions about that, so I don't
11 believe that's correct.

12 MR. ALLEN: Okay. So then you will allow
13 questioning to continue regarding Westbound's
14 corporate structure and --

15 MR. BUSCH: I'm just going to ask you not
16 to repeat the same questions you asked before.

17 Q (Continuing by MR. ALLEN): And I have some questions
18 regarding -- we went off the record talking about the
19 different sources of income, Mr. Boladian, that you
20 receive as the purported owner of sound recordings
21 that Mr. Clinton played a role in creating. Do you
22 recall that testimony? You were talking about record
23 sales, that's where I want to pick up.

24 A Sure.

25 Q Okay. So other than record sales how do you get

1 income for the -- for your ownership of sound
2 recordings?

3 A That's it, predominantly through record sales.

4 Q Okay. Do you get licensing fees for licensing the
5 sound recordings to other parties?

6 A From other -- yes, if they, if they should use it,
7 yeah.

8 Q Okay. So how does that work; people seek you out,
9 because you're the titled owner in the US copyright
10 office, they want to use one of the sound recordings,
11 let's say a movie, they call -- they contact your
12 company and you strike a deal; how does that work?

13 A Yeah, you, you said it right there. They seek us out
14 and, and you try to sit down and negotiate something
15 that's within their scope and, and there you are.

16 Q Okay. And does that apply to sampling? And when I
17 say that, I'm asking do you get inquiries to use
18 portions, portions of sound recordings and you license
19 those out?

20 A Yes, if they should request it.

21 Q Okay. What other forms of income do you receive as
22 the purported owner of sound recordings? You said
23 record sales, sampling, movies, for example,
24 commercials; anything else?

25 A Not that I can think of.

1 Q Okay. And so a payment will come in for you licensing
2 a work, a sound recording, and do you keep that in a
3 separate account; how do you, how do you keep track of
4 the money that you get for a particular sound
5 recording?

6 A Come into Westbound Records if it was a sound
7 recording.

8 Q Okay. And so who keeps track of that income?

9 A Well, it would, it would be kept by Sarah primarily.

10 Q Sarah Catlett?

11 A Yeah.

12 Q Okay. And her title again is what?

13 A She has a broad title. She wears many hats. So pick
14 a, pick a title and it could possibly fit.

15 Q Does she have any sort of accounting background?

16 A Sarah is quite diverse. I don't know what her major
17 was in school but, but she's very talented in many
18 different ways, broad spectrum. She's, she's it.

19 Q Okay. Does she interact with Westbound's accountants?

20 A Is she an accountant?

21 Q No. Does she interact with Westbound's accountants?

22 A Not really.

23 Q Okay. Who, who provides accounting data to your --
24 let me step back. Does Westbound have an accountant?

25 A Yes.

1 Q Who is that?

2 A His name is Robert Simonian.

3 Q Can you spell that for me, sir?

4 A Robert, R-O-B-E-R-T; S-I-M-O-N-I-A-N.

5 Q Okay. And whose responsibility is it to provide data
6 to Mr. Simonian?

7 A Well, Ms. Catlett would receive whatever information
8 there is and would get it over to Bob or he would stop
9 by, pick it up.

10 Q Okay. And does he compile the company -- and I'm --
11 does he compile Westbound's tax, tax returns?

12 A It's diminished considerably over the years so there's
13 not an awful lot. Like I said, the business has
14 changed. And, and you just have to change with it and
15 scale back or just not deal with it anymore.

16 Q Okay. Who keeps track of the -- of Westbound's bank
17 deposits?

18 A Well, Bob would primarily double check and handle it.

19 Q Okay. So if you receive a check at your post office
20 box, who deposits that in the bank?

21 A Well, Kim could probably do that.

22 Q Who's that?

23 A Kim.

24 Q Kim, who's Kim?

25 A Kim does some work also and she maybe goes and picks

1 it up.

2 Q And what's Kim's last name?

3 A Simonian as well.

4 Q Okay. Are they related?

5 A Bob and Kim are husband and wife, yes.

6 Q Okay. And are they certified public accountants?

7 A I don't -- Kim is not but --

8 Q No.

9 A -- I think Bob is. I've never seen or know about a
10 certificate hanging on his wall. And I couldn't see
11 it anyway, but I -- let's say I don't know but I'm
12 hoping.

13 Q How long have you used Mr. Simonian's services as your
14 accountant?

15 A The last several years.

16 Q Okay. And does the process work the same in terms of
17 Sarah keeping track of the data for Bridgeport and
18 Eastbound; do you do anything different with those
19 companies than you do with the financial data and
20 accounting that you just testified to with respect to
21 Westbound?

22 A Well, Eastbound is almost dormant. There's nothing
23 going on with the label or the artists or the masters.
24 Most of the artists are deceased. And, like I said,
25 the business has changed dramatically. It's day by

1 day, week by week. It changes even more, as most
2 industries have.

3 Q Is there anybody other than Sarah Catlett that deals
4 with the requests from various artists for advances?

5 A For various advances?

6 Q Yes. There are a number of documents that have been
7 produced in this case where Mr. and Mrs. Worrell both
8 requested advances. And it seems that Sarah's the
9 primary contact for that.

10 A Oh, that was -- yeah, they're basically the only ones.
11 I mean everything is -- there's nobody left, they're
12 all dead.

13 Q So that was a question I was actually going to ask
14 you. It seemed like it was a fairly regular
15 occurrence that either Mr. Worrell, when he was alive,
16 or Mrs. Worrell, when she -- or after he died, after
17 Mr. Worrell died, would ask for advances on royalties.
18 Do you recall, do you recall some of those
19 interactions that you had with Mr. and Mrs. Worrell
20 about advances?

21 A How many years ago are we talking about?

22 Q Well, I only have data going back to 2010 so I guess
23 we're talking the last 14 years.

24 A Okay. Yeah, at that time they needed advances for
25 various payments, or money that they needed for

1 payments, and we would try to assist in that manner.

2 Q How many artists does Bridgeport today pay royalties
3 to?

4 A You know, I couldn't --

5 Q I'm talking about Bridgeport for the time being.

6 A I couldn't even tell you, sir.

7 Q Can you give me an approximation; is it a dozen, is it
8 two dozen, three dozen, a hundred?

9 A I can't tell you, sir.

10 Q Is it less than a hundred?

11 MR. BUSCH: Objection, asked and answered.

12 He said he can't tell you.

13 A I can't tell you, sir.

14 Q (Continuing by MR. ALLEN): Is it, is it a regular
15 occurrence that one of your artists in any of your
16 companies will make as many requests for advances as
17 Mrs. and Mr. Worrell made?

18 MR. BUSCH: Object to form, lack of
19 foundation, --

20 MR. QUICK: Join.

21 MR. BUSCH: -- assumes facts not in
22 evidence.

23 A You know, it's hard to say. I mean various ones had
24 requested advances, but everything has changed so much
25 that many of, many of them that used to request are

1 not even around anymore.

2 Q (Continuing by MR. ALLEN): Would you describe Mr. and
3 Mrs. Worrell as being more anxious about getting their
4 advance -- getting advances than the other artists
5 that you pay royalties to?

6 A It all --

7 MR. BUSCH: Object to form.

8 A It all depends on the situation. Some are a little
9 more financially strapped. It's hard to say. It
10 could very -- everything changed week by week.

11 Q (Continuing by MR. ALLEN): Over what period are you
12 talking about where things changed week by week?

13 A Over many years everything has changed so much. Some
14 are a little more in financial need than others. It
15 all depends on the predicament that each one is in.
16 It's difficult to say, you know.

17 Q Does it place a strain on a company of your size to
18 process as many requests for advances as were made by
19 the Worrells?

20 MR. BUSCH: Object to form.

21 A You know, it's hard to say. We're not a bank, of
22 course, but we try to be as accommodating as possible,
23 that's it. I mean what can I say. It's -- we do, we
24 do the best we can to accommodate the best we can,
25 that's it.

1 Q (Continuing by MR. ALLEN): Okay. Have any of those
2 accommodations included providing advances to
3 Mr. Clinton?

4 MR. BUSCH: In what period of time?

5 MR. ALLEN: The last 14 years.

6 A I don't know about the last 14 years but before that
7 there was quite a bit that was advanced to
8 Mr. Clinton.

9 Q (Continuing by MR. ALLEN): Okay. When was the last
10 time that you advanced money to Mr. Clinton?

11 A I don't remember --

12 MR. BUSCH: Ob -- go ahead. Go ahead,
13 Armen, sorry.

14 A I don't remember. I mean it's been quite a while, but
15 in the past it was quite a bit, quite a bit.

16 Q (Continuing by MR. ALLEN): Are you currently paying
17 Mr. Clinton any royalties for anything out of any of
18 your companies?

19 A No. I think we, we paid him a considerable amount in
20 the past, far and above what anybody of our size would
21 have done.

22 Q Okay. When did you -- when did your companies cease
23 paying Mr. Clinton for royalties?

24 A I don't remember.

25 Q Has it been --

1 MR. BUSCH: What is the relevance, what is
2 the relevance of this to this case?

3 MR. ALLEN: My client's being sued. The
4 claim is that he's receiving royalties that are
5 rightfully Judith Worrell's -- or the estate of Bernie
6 Worrell's. I'm establishing --

7 MR. BUSCH: But not on -- but you're --

8 MR. ALLEN: -- he's not receiving these
9 from at least this record company, or any others at
10 this point, and I think you know that.

11 MR. BUSCH: We're talking about advances
12 and we're talking about -- we're not -- you're talking
13 about publishing --

14 MR. ALLEN: You're, you're just talking
15 because that's what you do and that's inappropriate.

16 MR. BUSCH: Why do you keep insulting me,
17 Mr. Allen? From the beginning of this --

18 MR. ALLEN: Because you are, you are
19 interfering with my ability to get truthful answers
20 from your client.

21 MR. BUSCH: I am not.

22 MR. ALLEN: You're feeding --

23 MR. BUSCH: I am not at all.

24 MR. ALLEN: You're feeding --

25 MR. BUSCH: I'm not at all. The record

1 speaks for itself. I've not done that at all. I just
2 asked a question, what is the relevance of this --

3 MR. ALLEN: The record will reflect it.

4 MR. BUSCH: -- and what does it have to do
5 with this case?

6 MR. ALLEN: The relevancy objection is
7 inappropriate in the Eastern District of Michigan so
8 if you have, if you have, --

9 MR. BUSCH: You made --

10 MR. ALLEN: -- if you have an objection as
11 to the form of my question, make the objection as to
12 form and let's move on. That's how we get through a
13 three hour deposition in three hours.

14 MR. BUSCH: I understand, but you made
15 certain representations about the need for this
16 deposition. You're going well beyond those.

17 MR. ALLEN: Okay, so is it your -- are you
18 instructing your witness --

19 MR. BUSCH: No, I'm not. Let's just keep
20 going. Listen, let's just get this over with.

21 Q (Continuing by MR. ALLEN): So, Mr. Boladian, have you
22 paid my client any money in the last 14 years that you
23 can remember?

24 A I don't remember.

25 Q Okay. You don't have any evidence sitting here today

1 that you've paid my client any money in the last 14
2 years through any of your companies, do you?

3 A I don't remember, sir, at all.

4 Q Okay. And beyond not remembering you don't -- you
5 didn't bring any documents with you that would
6 establish that fact, would you have?

7 A I don't have any documents.

8 Q Okay. Do you have any recollection of sending an
9 e-mail dated December 28, 2020 to Sarah Catlett asking
10 her about an inquiry that Ms. Worrell made for a
11 advance?

12 A No.

13 Q Okay. If I told you that there has been an e-mail
14 that's been produced from your e-mail address dated
15 December 28, 2020 at 4:36 p.m., would you dispute
16 that?

17 A No, but I don't know, being that I can't see, I don't
18 know. That's all I can say. I don't, --

19 Q So --

20 A -- I don't know what you have. I can't even -- 2020,
21 I can't remember what I ate for lunch on Monday.

22 Q Did you temporarily regain your sight on December
23 28th, 2020 at 4:36 p.m.; do you have any recollection
24 of anything like that occurring?

25 MR. BUSCH: Are you trying to mock

1 Mr. Boladian, Mr. Allen?

2 MR. ALLEN: No, I'm asking him a question.
3 There's an e-mail that's dated December 28, 2020 from
4 him and I'm just trying to figure out how he sent
5 that.

6 MR. BUSCH: Well, you're assuming he sent
7 it himself personally. And I'm going to ask you, are
8 you mocking a blind 90-year-old --

9 MR. ALLEN: I am not doing --

10 MR. BUSCH: -- man with dementia?

11 MR. ALLEN: -- no such thing, sir. I'm
12 asking him whether he --

13 MR. BUSCH: Sounds like you are. Sounds
14 like you are, Mr. Allen.

15 MR. ALLEN: You're entitled to your
16 opinion, sir, and I'm entitled to my answer.

17 A I don't recall.

18 Q (Continuing by MR. ALLEN): Okay.

19 MR. BUSCH: If you make a remark like that
20 again, we're going to go to the court. I just want
21 you to know.

22 MR. ALLEN: Okay. You do realize that
23 there is a history of this, Mr. Busch, that was noted
24 by a jury in prior litigation of Mr. Boladian saying
25 that he was blind and playing on his Apple iPhone all

1 throughout that trial, so --

2 MR. BUSCH: That's -- I don't know what
3 you're talking about. That's absolutely a lie.

4 MR. ALLEN: Okay.

5 MR. BUSCH: That is -- that's another mis
6 -- that is a blatant lie.

7 Q (Continuing by MR. ALLEN): Sir, I'm wondering if you
8 know why Ms. Catlett is still sending e-mails to you
9 on November 22nd, 2023 at 1:34 p.m.; is she aware of
10 your condition, sir?

11 A Oh, yeah, she is.

12 Q Okay. And is there a reason why she would send an
13 e-mail that -- to your e-mail address on November
14 22nd, 2023?

15 A Maybe she's just trying to make a record of it, I
16 don't know.

17 Q Okay. So I'd have to ask her about that, wouldn't I?

18 A Yeah, I believe.

19 Q Okay. Why do you maintain an e-mail address,
20 Mr. Boladian?

21 A I'm sorry, sir?

22 Q Why do you maintain an e-mail address?

23 A Well, isn't that what's happening these days is an
24 e-mail address.

25 Q Who monitors your e-mail for you?

1 A My sister, maybe another member of the family.

2 Q What's your sister's name?

3 A Elizabeth.

4 Q And her last name?

5 A Amboian, A-M-B-O-I-A-N.

6 Q The settlement agreement, the settlement agreement and
7 release that you signed in December 2023 that you
8 don't -- or I think you testified you don't care
9 what's in it, do you believe that that accurately
10 reflects an agreement that you and your company made
11 with Ms. Worrell in the estate of Bernie Worrell?

12 MR. QUICK: Foundation.

13 MR. BUSCH: Join.

14 A The agreement that Mr. Levinson drew up, that one?

15 Q (Continuing by MR. ALLEN): Yeah, the one that
16 Mr. Levinson drew up and that Mr. Busch represented
17 the estate on at that time.

18 A If Mark handled it and I have complete confidence in
19 his judgment and -- yeah. What am I going to do at
20 this stage of the game. I can't even see or stand up
21 correctly.

22 Q Who is the -- who will be the successor to you when
23 and if you decide to step down or are unable to
24 perform as the president of Westbound Records?

25 A You know, that's a good question. That's a good

1 question.

2 Q Do you -- I mean do you have an estate plan that deals
3 with, deals with that?

4 A We --

5 MR. BUSCH: What does this have to do with
6 anything, Mr. Allen?

7 MR. ALLEN: I want to know who's benefiting
8 from the settlement agreement and release that's,
9 that's directly relevant to this case.

10 MR. BUSCH: Why is who's ben -- why who
11 will take over Westbound when Mr. Boladian dies have
12 anything to do with this case?

13 MR. ALLEN: You've made your objection.
14 Mr. Boladian, I'd like an answer.

15 MR. BUSCH: For harassing him, I think
16 you're just trying to --

17 MR. ALLEN: I'm not harassing him,
18 Mr. Busch.

19 MR. BUSCH: You are.

20 MR. ALLEN: I'm not harassing him.

21 MR. BUSCH: Listen to me, by mocking him,
22 by saying why does a blind man have an e-mail, by
23 suggesting in a complete lie that a jury noted
24 somewhere that he was playing on his phone when he was
25 supposedly blind, which is a --

1 MR. ALLEN: Right.

2 MR. BUSCH: -- blatant lie. You are
3 harassing him and repeatedly doing so, and we will
4 bring his all to the attention of the court. I just
5 want you to know that.

6 MR. ALLEN: I welcome, I --

7 MR. BUSCH: I welcome it too.

8 MR. ALLEN: It will be a race to the
9 courthouse.

10 MR. BUSCH: You started this out by
11 threatening me --

12 MR. ALLEN: It will be a race to the
13 courthouse.

14 MR. BUSCH: Let's go for it.

15 MR. ALLEN: We'll talk about your unclean
16 hands to the court when we --

17 MR. BUSCH: Unclean hands, give me a break.
18 Listen, you're not going to harass this man any
19 further. If you have real questions, ask them.

20 MR. ALLEN: I, I have my questions and I
21 have one pending on, on, on the table that is wholly
22 appropriate. If you're directing your client not to
23 answer --

24 MR. BUSCH: I'm not but you are harassing
25 him and we're going to bring --

1 MR. ALLEN: Okay, --

2 MR. BUSCH: -- this to the court's
3 attention.

4 MR. ALLEN: -- so let's get an answer to
5 the question so we can move on, please.

6 Q (Continuing by MR. ALLEN): Do you have an estate
7 plan, sir?

8 A You know what, would you repeat -- is that your
9 question, sir?

10 Q Do you have an estate plan, sir?

11 A No, not exactly. We've talked about what would happen
12 but we haven't come to any final conclusions yet. I
13 mean it's got to be somebody that is interested in the
14 business. It's not like you could pick somebody up
15 that worked at a drug store or at Subway or something.
16 It takes a certain love or ability to like the
17 business. Like I said, it's not like a regular retail
18 business of any type, so it has to be given a lot of
19 thought I think, you're right.

20 MR. ALLEN: Okay. Well, in light of
21 Mr. Busch's prior admonition that he will instruct his
22 client not to answer any questions about the prior
23 litigation between Mr. Boladian and Mr. Clinton, I
24 don't see much point in continuing the deposition at
25 this point. And we'll seek an appropriate order to

1 continue the deposition to explore those issues, which
2 I believe are directly relevant to this case.

3 MR. BUSCH: Okay, all right, let me see if
4 I have any questions for Mr. Boladian. If we can go
5 off the record for a moment, please.

6 (WHEREUPON a short pause was
7 had in the proceedings.)

8 EXAMINATION

9 BY MR. BUSCH:

10 Q I just have a couple questions to follow-up with
11 Mr. Boladian.

12 Mr. Boladian, can you hear me?

13 A Hello, yes, I can.

14 Q Okay. Mr. Boladian, you were asked by Mr. Allen a few
15 questions about the Bridgeport royalty statements and
16 different entries on the Bridgeport royalty statement.
17 If there's an entry on a Bridgeport royalty statement,
18 what does it apply to?

19 A Bridgeport, Bridgeport -- Bridgeport, yeah.

20 Q And would that be publishing or sound recording
21 royalties?

22 A Bridgeport would be publishing.

23 Q Okay. And several times today you said, in response
24 to Mr. Allen's question about specifically the
25 settlement agreement between Westbound and

1 Ms. Worrell, the estate of Bernie Worrell, that you
2 didn't care. You said that a few times that at the
3 time you just didn't care. Why is it that you didn't
4 care?

5 A Richard, you know my condition is horrible. I mean
6 I'm not well. I've got several doctors that I'm
7 running to that I'm not even thinking about other
8 stuff. I've got enough to deal with and I think you
9 know that already.

10 MR. BUSCH: Okay, all right, that's all I
11 have. Thank you, Mr. Boladian. I guess with that
12 we're finished.

13 MR. QUICK: May I just ask one follow-up
14 question, please.

15 MR. BUSCH: Yes.

16 MR. QUICK: Thank you. Mr. Boladian, my
17 name is Dan Quick and I represent Bernie Worrell's
18 estate. Just one follow-up question.

19 EXAMINATION

20 BY MR. QUICK:

21 Q You gave some testimony with regard to the American
22 Music Federation and arrangements that Westbound had
23 with it. Do you recall that?

24 A You mean the AFM agreement with the musicians union,
25 that agreement?

1 Q Yes, sir.

2 A Yes.

3 Q Okay. And in connection with those agreements do you
4 recall that Westbound had a written agreement of any
5 sort with Mr. Worrell?

6 A No, no. I mean we paid him and, and the checks were
7 verified that we paid him. Other than that there was
8 nothing directly with Bernie. He was part of the, the
9 group.

10 Q And earlier you described the union agreement as
11 related to the services for the musicians for a
12 particular session. Did, did that agreement, or any
13 other agreement that Westbound had with Mr. Worrell,
14 have anything to do with any rights he may have had in
15 the sound recordings to the works on which he
16 contributed?

17 A No. We would pay him for session work. He was part
18 of the group and we paid him as a musician like we did
19 all the other musicians.

20 Q So if Mr. Clinton appears as one of the musicians on
21 some of the sessions, whatever you paid Mr. Clinton
22 for that session, did it have anything to do with who
23 owned the copyright?

24 A No.

25 Q Okay. And to the extent that Mr. Worrell is claiming

1 in this lawsuit that he was a co-author of a number of
2 works and hence a co-owner in the sound recordings of
3 those works, did any of the arrangements between
4 Westbound and Mr. Worrell have anything to say on that
5 topic, to your knowledge?

6 A Not to my knowledge.

7 MR. QUICK: Thank you, nothing further.

8 RE-EXAMINATION

9 BY MR. ALLEN:

10 Q Did you, Mr. Boladian, ever pay Mr. Worrell as a owner
11 of a sound recording?

12 A No.

13 Q So the sound recordings you claim ownership in today,
14 you've never compensated Mr. Worrell as a co-owner of
15 those sound recordings, correct?

16 A No.

17 Q So on those sound recordings, at least, you can
18 testify that it was never the intention to have
19 Mr. Worrell as a co-owner of that -- of those sound
20 recordings that you claim an own -- in which you claim
21 an ownership?

22 MR. QUICK: Form.

23 MR. BUSCH: Object, objection, --

24 MR. QUICK: Form and foundation.

25 MR. BUSCH: -- yeah, objection to form,

1 lack of foundation and it's vague and ambiguous. I'll
2 leave it at that.

3 Q (Continuing by MR. ALLEN): I'll have an answer to my
4 question, sir.

5 A Would you repeat the question.

6 MR. ALLEN: Sue, repeat the question.

7 (WHEREUPON the reporter read
8 back the question as follows):

9 QUESTION: "So on those sound recordings, at least,
10 you can testify that it was never the
11 intention to have Mr. Worrell as a co-owner
12 of that -- of those sound recordings that
13 you claim an own -- in which you claim an
14 ownership?"

15 MR. BUSCH: When you say co-owner, do you
16 mean co-owner between Mr. Boladian and Mr. Worrell?

17 MR. ALLEN: Westbound, Westbound.

18 A Westbound, yeah, correct.

19 Q (Continuing by MR. ALLEN): Do you have any evidence
20 to support an allegation that Mr. Clinton and
21 Mr. Worrell intended to be co-owners of any sound
22 recording?

23 A I have no -- nothing. I don't know.

24 MR. ALLEN: Nothing further for me.

25 MR. BUSCH: Okay, I have nothing further

1 based upon your questions. I don't know if Mr. Quick
2 does but I don't.

3 MR. QUICK: Nothing further. Thank you
4 very much.

5 THE WITNESS: Thank you. Have a good
6 holiday.

7 MR. QUICK: You as well.

8 MR. BUSCH: Thank you.

9 MR. ALLEN: Thank you.

10 (WHEREUPON the deposition was
11 concluded at approximately
12 3:54 p.m.)

13 (WHEREUPON Exhibit Nos. 1-3
14 were marked for identification
15 by the reporter.)
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25

1 STATE OF MICHIGAN)
) SS.
2 COUNTY OF WAYNE)

3
4 I, Suzanne Lynn Bonarek, a Notary Public
5 duly commissioned and qualified in and for the State
6 of Michigan, do hereby certify that pursuant to the
7 Michigan Court Rules on the 4th day of December, 2024,
8 the following named person, ARMEN BOLADIAN, was by me
9 duly sworn to testify to the truth concerning the
10 matters in controversy in this cause; that he was
11 thereupon carefully examined upon his oath and his
12 examination reduced to typewritten form under my
13 supervision; that the deposition is a true record of
14 the testimony given by the witness.

15
16 I FURTHER CERTIFY that I am neither
17 attorney or counsel for, nor related to or employed
18 by, any of the parties to the action in which this
19 deposition is taken; and, further that I am not a
20 relative or employee of any attorney or counsel
21 employed by the parties hereto or financially
22 interested in the action.

23
24 IN WITNESS WHEREOF I have hereunto set my
25 hand and affixed my Notarial Seal this 5th day of
 December, 2024.

 /s/ Suzanne Lynn Bonare

SUZANNE LYNN BONAREK, CSR 3086
Wayne County, Michigan
My Commission Expires: 3-27-26

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